

Hearing Date: TBD  
Objection Deadline: August 11, 2021 at 4:00 p.m. AST

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**SUMMARY COVER SHEET FOR SEVENTH INTERIM APPLICATION OF  
BROWN RUDNICK LLP, CLAIMS COUNSEL TO THE  
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE,  
FOR PROFESSIONAL COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE ELEVENTH INTERIM FEE PERIOD  
FROM OCTOBER 1, 2020 THROUGH JANUARY 31, 2021**

**ALL FEES AND SERVICES IN THIS INTERIM APPLICATION  
WERE INCURRED OUTSIDE OF PUERTO RICO**

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**Summary Sheet**

Name of Applicant:	Brown Rudnick LLP (“ <u>Brown Rudnick</u> ”)
Authorized to Provide Professional Services as:	Claims Counsel for The Financial Oversight and Management Board, acting through its Special Claims Committee
Name of Client:	The Financial Oversight and Management Board, acting through its Special Claims Committee
Petition Date:	May 3, 2017 <sup>2</sup>
Retention Date:	November 28, 2018
Compensation Period:	October 1, 2020 to January 31, 2021 (the “ <u>Compensation Period</u> ”)
Total Compensation Sought:	\$612,405.00
Expense Reimbursement Sought:	\$2,238.65
Total Compensation and Expense Reimbursement Sought:	\$614,643.65
Prior Applications Filed:	First Interim Fee Application (ECF No. 5705), Second Interim Fee Application (ECF No. 7756), Third Interim Fee Application (ECF No. 9316), Fourth Interim Fee Application (ECF No. 12847); Fifth Interim Fee Application (ECF No. 15765); Sixth Interim Fee Application (ECF No. 16282)

This is an: \_\_\_\_ monthly      X interim      \_\_\_\_ final application

This is Brown Rudnick LLP’s seventh interim application in these cases (this “Application”).

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<sup>2</sup> The petition date for the Commonwealth under Title III was May 3, 2017. The petition date for COFINA under Title III was May 5, 2017. The petition date for ERS and HTA under Title III was May 21, 2017. The petition date for PREPA under Title III was July 2, 2017.

Additional Information required pursuant to the *United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* effective as of November 1, 2013:

Total Compensation Approved by Interim Order to Date: \$5,600,118.08

Total Expense Reimbursement Approved by Interim Order to Date: \$265,251.08

Total Allowed Compensation Paid to Date: \$4,914,955.45

Total Allowed Expense Reimbursement Paid to Date: \$265,251.08

Total Compensation Sought in this Application Already Paid Pursuant to Monthly Compensation Statements but not yet Allowed: \$542,897.03

Total Expense Reimbursement Sought in this Application Already Paid Pursuant to Monthly Compensation Statements but not yet Allowed: \$2,238.65

Blended Hourly Rate in this Application for all Attorneys: \$790.00

Blended Hourly Rate in this Application for all Timekeepers: \$738.28

Number of Professionals in this Application: 9

Number of Professionals Billing Fewer than 15 hours in this Application: 3

Difference Between Fees Budgeted and Compensation Requested for this Period: 17.15% under budget

Rate Increases Since Date of Retention: None

Disclosure of Compensation Sought in this Application Using Rates Disclosed at Retention: N/A

**Summary of Prior Monthly Fee Statements  
for this Compensation Period Only**

Date	Period Covered	Total Fees	Fees Requested (90%)	Holdback (10%)	Expenses Requested	Fees Paid	Expenses Paid (100%)
11/20/2020	October 1, 2020 through October 31, 2020	\$166,048.00	\$149,443.20	\$16,604.80	\$324.95	\$147,201.55	\$324.95
12/22/2020	November 1, 2020 through November 30, 2020	\$180,846.00	\$162,761.40	\$18,084.60	\$1,357.00	\$160,319.98	\$1,357.00
1/6/2021	December 1, 2020 through December 31, 2020	\$145,601.00	\$131,040.90	\$14,560.10	\$370.10	\$129,075.29	\$370.10
3/8/2021	January 1, 2021 through January 31, 2021	\$119,910.00	\$107,919.00	\$11,991.00	\$186.60	\$106,300.21	\$186.60
<b>TOTAL</b>		<b>\$612,405.00</b>	<b>\$551,164.50</b>	<b>\$61,240.50</b>	<b>\$2,238.65</b>	<b>\$542,897.03</b>	<b>\$2,238.65</b>

**Summary of Amounts Requested to be Paid for Compensation Period**

Total Unpaid Fees:	\$69,507.97
Total Unpaid Expenses	\$0.00
Total 10% Holdback on Fees:	\$61,240.50
Reimbursement for 1.5% Government Contribution:	\$8,267.47
<b>Total Amount Requested to be Paid:</b>	<b>\$69,507.97</b>

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DISTRICT OF PUERTO RICO**

In re

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**SEVENTH INTERIM APPLICATION OF  
BROWN RUDNICK LLP, CLAIMS COUNSEL TO THE  
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE,  
FOR PROFESSIONAL COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE ELEVENTH INTERIM FEE PERIOD  
FROM OCTOBER 1, 2020 THROUGH JANUARY 31, 2021**

TO THE HONORABLE LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT COURT JUDGE:

Brown Rudnick LLP ("Brown Rudnick"), special counsel to the Financial Oversight and Management Board, acting through its Special Claims Committee (the "Oversight Board") as representative of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Corporation, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Electric Power

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Authority, and the Puerto Rico Public Buildings Authority (collectively, the “Debtors”) in the above-captioned title III cases (the “Title III Cases”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> hereby submits this seventh interim fee application (the “Seventh Interim Application” or “Application”),<sup>3</sup> pursuant to PROMESA sections 316 and 317, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”),<sup>4</sup> Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico (the “Local Bankruptcy Rules”), Appendix B of the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Large Chapter 11 Cases* effective as of November 1, 2013 (the “U.S. Trustee Guidelines,” and together with the aforementioned statutes, rules and guidelines, the “Guidelines”), and in accordance with the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* entered by this Court on June 6, 2018 [Docket No. 3269] (the “Interim Compensation Order”), seeking entry of an order granting (a) the allowance of interim compensation in the aggregate amount of \$612,405.00 in fees for reasonable and necessary professional services rendered and (b) reimbursement of actual and necessary expenses in the aggregate amount of \$2,238.65 incurred during the period commencing October 1, 2020 through and including January 31, 2021 (the “Compensation Period”). In support of this Application, Brown Rudnick respectfully states the following:

### **Jurisdiction and Venue**

1. The Court has subject matter jurisdiction to consider and determine this Seventh Interim Application pursuant to PROMESA section 306(a). Venue is proper before this Court

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<sup>2</sup> PROMESA has been codified in 48 U.S.C. §§ 2101-2241.

<sup>3</sup> The Application solely pertains to fees and expenses incurred with respect to the Debtors’ Title III Cases and does not address fees or expenses incurred with respect to other services performed for the Oversight Board outside the Title III process.

<sup>4</sup> The Bankruptcy Rules are made applicable to the Debtors’ Title III Cases pursuant to PROMESA section 310.

pursuant to PROMESA section 307(a). The statutory predicates for the relief requested herein are PROMESA sections 316 and 317, Bankruptcy Rule 2016 and Local Rule 2016-1.

2. This Application has been prepared in accordance with the Guidelines and the Interim Compensation Order. Attached hereto as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

### **Background and Case Status**

#### **A. The Debtors' Title III Cases**

3. On June 30, 2016, the Oversight Board was established under PROMESA section 101(b).

4. On August 31, 2016, President Obama appointed the Oversight Board's seven voting members.

5. Pursuant to PROMESA section 315, "[t]he Oversight Board in a case under this title is the representative of the debtor[s]" and "may take any action necessary on behalf of the debtor[s] to prosecute the case[s] of the debtor[s], including filing a petition under section 304 of [PROMESA] . . . or otherwise generally submitting filings in relation to the case[s] with the court."

6. On September 30, 2016, the Oversight Board designated the Debtors as "covered entit[ies]" under PROMESA section 101(d).

7. On May 3, 2017, the Oversight Board issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief for the Commonwealth of Puerto Rico (the "Commonwealth") pursuant to section 304(a) of PROMESA, commencing a case under title III thereof.

8. On May 5, 2017, the Oversight Board filed a voluntary petition for relief for the Puerto Rico Sales Tax Financing Corporation ("COFINA") pursuant to section 304(a) of PROMESA, commencing a case under title III thereof.

9. On May 21, 2017, the Oversight Board filed a voluntary petition for relief for each of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) and the Puerto Rico Highways and Transportation Authority (“HTA”) pursuant to section 304(a) of PROMESA, commencing cases under title III thereof.

10. On July 2, 2017, the Oversight Board filed a voluntary petition for the Puerto Rico Electric Power Authority (“PREPA”) pursuant to section 304(a) of PROMESA, commencing a case under title III thereof.

11. Through orders issued on June 1, June 29 and October 6, 2017, the Court ordered the joint administration of the Title III Cases for the Debtors, for procedural purposes only [Docket Nos. 242, 537 and 1417].

12. Background information regarding the Commonwealth and its instrumentalities, and the commencement of the instant Title III Cases, is contained in the *Notice of Statement of Oversight Board in Connection with PROMESA Title III Petition* [Docket No. 1] attached to the Commonwealth’s Title III petition.

**B. Retention of Brown Rudnick**

13. Brown Rudnick is an international law firm with its offices located in New York and Boston, among other locations. Brown Rudnick has significant experience representing parties in bankruptcy actions and litigations in many large, complex cases. Brown Rudnick has represented principal parties in interest, including official and *ad hoc* committees and debtors, in both in and out-of-court proceedings in some of the largest and most complex restructurings of all time.

14. As set forth in the Independent Contract Services Agreement dated July 1, 2019 (the “Services Agreement”),<sup>5</sup> Brown Rudnick was retained by and authorized to represent the Oversight

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<sup>5</sup> A copy of the Services Agreement is available on the Oversight Board’s website at <http://oversightboard.pr.gov/documents/>.



Board, acting through its Special Claims Committee, to assist the Special Claims Committee regarding investigation and pursuit of potential claims.

**C. Interim Compensation and Fee Examiner Orders**

15. On August 23, 2017, the Court entered the *Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1150].

16. On October 6, 2017, the Court appointed a Fee Examiner in these Title III Cases (the “Fee Examiner”) pursuant to the *Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(a) Appointing a Fee Examiner and Related Relief* [Docket No. 1416] (the “Fee Examiner Order”).

17. On November 10, 2017, the Fee Examiner issued a memorandum, and on January 3, 2018, the Fee Examiner issued a supplemental memorandum (together, the “Fee Examiner Guidelines”) to all retained professionals in these Title III Cases providing additional guidelines in connection with the Interim Compensation Order.

18. On May 8, 2018, the Fee Examiner filed the *Motion of the Fee Examiner to Amend the Fee Examiner Order with Respect to the Scope of the Fee Examiner’s Authority in the Interest of Administrative Efficiency* [Docket No. 3032] (the “Motion to Amend the Fee Examiner Order”).

19. On May 23, 2018, the Oversight Board and the Puerto Rico Fiscal Agency and Financial Authority (“AAFAF”) filed a *Joint Motion for Entry of an Order Further Amending the Interim Compensation Order* [Docket No. 3133].

20. On June 6, 2018, the Court entered the Interim Compensation Order, and in accordance therewith, Brown Rudnick and other professionals retained in these Title III Cases were authorized to serve upon the parties identified therein (the “Notice Parties”) monthly fee statements (the “Monthly Fee Statements”).

21. Pursuant to the Interim Compensation Order, the Notice Parties have ten days from the date of service of the Monthly Fee Statement to object to the amounts requested. If no objection

is filed prior to expiration of the objection period, the Commonwealth is authorized to pay the respective professionals 90% of the fees and 100% of the expenses sought in each Monthly Fee Statement.

22. On June 20, 2018, the Court entered the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing a Fee Examiner and Related Relief* [Docket No. 3324] (the “Amended Fee Examiner Order”).

**D. Applications for Interim Compensation**

23. In addition to the Monthly Fee Statements, the Interim Compensation Order directed professionals to seek interim allowance and payment of compensation (including the 10% held back from Monthly Fee Statements) and expense reimbursement at 120-day intervals (each an “Interim Fee Period”) by filing with the Court and serving on the Notice Parties an application for approval and allowance of all compensation and reimbursement of expenses relating to services rendered and expenses incurred during the preceding Interim Fee Period (*see* Interim Compensation Order at ¶2(f)).

24. This is Brown Rudnick’s seventh interim fee application and covers the period from October 1, 2020 through and including January 31, 2021.

**Relief Requested**

25. By this Application, Brown Rudnick seeks an order authorizing (a) allowance of interim compensation for the professional services rendered during the Compensation Period in the aggregate amount of \$612,405.00, (b) allowance of reimbursement of actual and necessary expenses incurred by Brown Rudnick in the aggregate amount of \$2,238.65, and (c) payment of the outstanding fees and expense reimbursement in the aggregate amount of \$69,507.97, inclusive of any amounts previously held back, including certain purported tax withholding and government contribution amounts.

26. During the Compensation Period, Brown Rudnick attorneys and paraprofessionals expended a total of 829.5 hours for which compensation is requested. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Oversight Board.

27. Brown Rudnick performed all services during the Compensation Period outside of Puerto Rico. As a result, fees relating to such services are not subject to withholding tax at source pursuant to Section 1062.03(b)(14) of the Puerto Rico Internal Revenue Code, as amended. Accordingly, Brown Rudnick respectfully requests reimbursement of all withheld amounts.

28. During the Compensation Period, Brown Rudnick submitted four Monthly Fee Statements (the twenty-third, twenty-fourth, twenty-fifth and twenty-sixth such statements submitted by Brown Rudnick).

29. On November 20, 2020, Brown Rudnick served its twenty-third monthly fee statement covering the period from October 1, 2020 through October 31, 2020 (the “Twenty-Third Monthly Fee Statement”), a copy of which is attached hereto as **Exhibit G-1**. Brown Rudnick received no objection to the Twenty-Third Monthly Fee Statement. On December 7, 2020, Brown Rudnick submitted a statement of no objection to AAFAF with respect to the Twenty-Third Monthly Fee Statement. On December 21, 2020, the Debtors paid Brown Rudnick \$147,201.55 on account of fees requested and \$324.95 on account of expense reimbursement requested. The Debtors withheld (i) \$16,604.80, the amount of the 10% holdback, plus (ii) \$2,241.65, representing a 1.5% government contribution that is deducted from all fees that exceed \$50,000.

30. On December 22, 2020, Brown Rudnick served its twenty-fourth monthly fee statement covering the period from November 1, 2020 through November 30, 2020 (the “Twenty-Fourth Monthly Fee Statement”), a copy of which is attached hereto as **Exhibit G-2**. Brown Rudnick received no objection to the Twenty-Fourth Monthly Fee Statement. On January 4, 2021, Brown Rudnick submitted a statement of no objection to AAFAF with respect to the Twenty-

Fourth Monthly Fee Statement. On January 15, 2021, the Debtors paid Brown Rudnick \$160,319.98 on account of fees requested and \$1,357.00 on account of expense reimbursement requested. The Debtors withheld (i) \$18,084.60, the amount of the 10% holdback, plus (ii) \$2,441.42, representing a 1.5% government contribution that is deducted from all fees that exceed \$50,000.

31. On January 6, 2021, Brown Rudnick served its twenty-fifth monthly fee statement covering the period from December 1, 2020 through December 31, 2020 (the “Twenty-Fifth Monthly Fee Statement”), a copy of which is attached hereto as **Exhibit G-3**. Brown Rudnick received no objection to the Twenty-Fifth Monthly Fee Statement. On January 19, 2021, Brown Rudnick submitted a statement of no objection to AAFAF with respect to the Twenty-Fifth Monthly Fee Statement. On January 22, 2021, the Debtors paid Brown Rudnick \$129,075.29 on account of fees requested and \$370.10 on account of expense reimbursement requested. The Debtors withheld (i) \$14,560.10, the amount of the 10% holdback, plus (ii) \$1,965.61, representing a 1.5% government contribution that is deducted from all fees that exceed \$50,000.

32. On March 8, 2021, Brown Rudnick served its twenty-sixth monthly fee statement covering the period from January 1, 2021 through January 31, 2021 (the “Twenty-Sixth Monthly Fee Statement”), a copy of which is attached hereto as **Exhibit G-4**. Brown Rudnick received no objection to the Twenty-Sixth Monthly Fee Statement. On March 19, 2021, Brown Rudnick submitted a statement of no objection to AAFAF with respect to the Twenty-Sixth Monthly Fee Statement. On March 30, 2021, the Debtors paid Brown Rudnick \$106,300.21 on account of fees requested and \$186.60 on account of expense reimbursement requested. The Debtors withheld (i) \$11,991.00, the amount of the 10% holdback, plus (ii) \$1,618.79, representing a 1.5% government contribution that is deducted from all fees that exceed \$50,000.

33. Other than with respect to those Monthly Fee Statements, no payments have been made to Brown Rudnick, and Brown Rudnick has received no promises of payment from any

source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered during the Compensation Period and addressed by this Seventh Interim Application. There is no agreement or understanding between Brown Rudnick and any other person, other than the members of Brown Rudnick, for the sharing of compensation to be received for services rendered in these cases.

34. In accordance with the Services Agreement, Brown Rudnick's hourly rate for all attorneys is \$790, \$270 for all paralegals and other non-lawyer staff, and \$90 for litigation analysts.

35. Brown Rudnick maintains computerized records of all time spent by Brown Rudnick attorneys and paraprofessionals in connection with its representation of the Oversight Board. Brown Rudnick has provided itemized time records for professionals and paraprofessionals performing services during the Compensation Period to this Court, the Debtors, the Fee Examiner, all notice parties pursuant to the Interim Compensation Order and the U.S. Trustee. All entries itemized in Brown Rudnick's time records comply with the requirements set forth in the Guidelines, including the use of separate matter numbers for different project types, as described in this Application. Brown Rudnick's itemized time records also detail expenses incurred during the Compensation Period. All entries itemized in Brown Rudnick's expense records comply with the requirements set forth in the Guidelines.

36. Pursuant to, and consistent with, the relevant requirements of the Guidelines, as applicable, the following exhibits are attached hereto and incorporated herein by reference:

- i. **Exhibit A** contains a certification by Sunni P. Beville regarding Brown Rudnick's compliance with the Local Guidelines.
- ii. **Exhibit B** contains a summary of hours and fees billed by each Brown Rudnick attorney and paraprofessional in services rendered to the Oversight Board during the Compensation Period, including respective titles, hourly rates, year of bar admission for attorneys and any applicable rate increases.
- iii. **Exhibit C** contains a summary of compensation requested by matter during the Compensation Period.

- iv. **Exhibit D** contains a summary and comparison of the aggregate blended hourly rates.
- v. **Exhibit E** contains a summary of reimbursable expenses incurred during the Compensation Period.
- vi. **Exhibit F** contains a budget plan with a comparative analysis of budgeted and actual fees during the Compensation Period.
- vii. **Exhibits G-1, G-2, G-3 and G-4** contain copies of Brown Rudnick's Monthly Fee Statements during the Compensation Period, which include detailed time records and out-of-pocket expense details.

**Summary of Services Performed by Brown Rudnick During the Compensation Period**

37. Set forth below is a description of significant professional services, broken down by project category, rendered by Brown Rudnick during the Compensation Period. The following services described are not intended to be a comprehensive summary of the work performed by Brown Rudnick. Detailed descriptions of all services rendered by Brown Rudnick can be found in the detailed time records reflecting the services performed by Brown Rudnick's professionals, the time expended by each professional, and the hourly rate of each professional, annexed to the Monthly Fee Statements attached hereto as **Exhibits G-1, G-2, G-3 and G-4** and such descriptions are incorporated herein by reference.

**A. Case Administration**

**Fees: \$486.00; Hours: 1.8**

38. During the Compensation Period, Brown Rudnick reviewed the case docket to identify pleadings relevant to its activities, including as to relevant hearing dates and objection deadlines for pleadings filed in connection with the various issues being monitored in this proceeding.

**B. Meetings and Communications with Client**

**Fees: \$9,717.00; Hours: 12.3**

39. During the Compensation Period, Brown Rudnick drafted agendas for periodic calls with the Oversight Board to provide status reports and recommendations for specific actions,

including as to the prosecution, tolling, and/or settlement of avoidance actions against (a) contract counterparties (“Vendors”), (b) recipients of purported principal and interest payments in respect of allegedly unlawful and invalid bonds, and (c) third-party professionals that, among other things, facilitated the issuance of allegedly unlawful and invalid bonds. In addition, Brown Rudnick engaged in periodic follow-up discussions with various members of the Oversight Board and drafted memoranda and resolutions regarding specific case and operational issues.

**C. Fee Applications**

**Fees: \$14,753.00; Hours: 53.1**

40. During the Compensation Period, Brown Rudnick prepared its monthly fee statements and budgets. In addition, Brown Rudnick assisted the Special Claims Committee’s professionals with their interim fee applications and monthly fee statements and coordinated with the fee examiner regarding objection submissions as necessary and appropriate.

**D. General Investigation**

**Fees: \$1,027.00; Hours: 1.3**

41. During the Compensation Period, Brown Rudnick reviewed legal pleadings and summaries of oral argument concerning the constitutionality of the appointment of the Oversight Board.

**E. Avoidance Actions**

**Fees: \$581,366.00; Hours: 754.6**

42. During the Compensation Period, Brown Rudnick variously prosecuted, negotiated, mediated, and/or resolved hundreds of avoidance actions against over a thousand defendants. These avoidance actions fell into several categories: (a) the “Vendor Avoidance Actions” filed and/or tolled against several hundred Vendors that received billions of dollars in aggregate payments from Puerto Rico without sufficient evidence of compliance with Puerto Rico law regarding government contracting; (b) the “Challenged Bonds Avoidance Actions” against the

beneficial holders of Commonwealth, PBA, and ERS bonds at relevant pre-petition periods, who received allegedly unlawful payments of principal and interest on the bonds; and (c) the “Underwriter Litigation” relating to misconduct of third-party professionals in connection with the allegedly unlawful bond issuances.

43. With respect to the Vendor Avoidance Actions, during the Compensation Period Brown Rudnick proceeded in accordance with litigation and mediation procedures previously approved by the Court, which established methods and timelines for resolution of the litigation mostly if not completely out of court and at minimal expense to the parties and the Court. Brown Rudnick coordinated with its professionals and the Official Committee of Unsecured Creditors’ (“Creditors’ Committee”) counsel and professionals to implement the procedures by soliciting and reviewing information supplied by hundreds of defendants to assess liability. Based on its review of information and/or pleadings, Brown Rudnick negotiated with defendants and drafted recommendations to its client and to the Creditors’ Committee regarding potential litigation outcomes and/or proposed resolutions. Brown Rudnick then in various cases as directed by its client and pursuant to recommendations variously dismissed defendants, advised tolled parties of its intent not to pursue litigation, and/or commenced negotiations to settle litigation in exchange for payments from the defendants. Brown Rudnick resolved related service issues and prepared to secure entry of default judgment in certain instances. Brown Rudnick additionally prepared communications and motions to extend deadlines, correct errors, and revise procedures and timelines due to the COVID-19 pandemic and other natural disasters affecting many Vendors, and implemented revised procedures accordingly.

44. During the Compensation Period, Brown Rudnick negotiated escrow agreements and related documents with the Creditors’ Committee and Banco Popular to open an account to hold funds received in settlement of certain Vendor Avoidance Actions.



45. With respect to the Challenged Bonds Avoidance Actions, Brown Rudnick responded to requests for information, clarification, payment records, and status updates from counsel to the Participants and defendants in the Challenged Bonds Avoidance Actions. Brown Rudnick reviewed the docket and addressed concerns from co-plaintiffs, related government parties, and defendants regarding the effect of the plan support agreement and plan on the Challenged Bonds Avoidance Actions, and appropriate treatment of defendants voicing defenses to litigation.

46. With respect to the Underwriter Litigation, during the Compensation Period Brown Rudnick negotiated with defendants concerning the scope of tolling agreements and releases and requested stay of litigation in conjunction with bond validity litigation in advance of the anticipated filing and confirmation of plans of adjustment for the Commonwealth, PBA, and ERS.

47. In addition to the foregoing, Brown Rudnick reviewed research and filings concerning, among other things, government investigations and natural disasters evidencing affected parties' liability to the Debtors and/or ability to respond to litigation demands and inquiries. Brown Rudnick discussed additional potential avoidance claims with the Special Claims Committee and its professionals and in some cases included recently uncovered bases for liability into ongoing negotiations with defendants.

**F. Third Party Claims**

**Fees: \$2,291.00; Hours: 2.9**

48. During the Compensation Period, Brown Rudnick reviewed, amended, and renewed tolling agreements with parties facing potential liability for, among other things professional misconduct in conjunction with bond issuances. Brown Rudnick engaged in negotiations with tolling parties and with the defendants to the aforementioned Underwriter Litigation.

**G. Plan and Disclosure Statement**

**Fees: \$2,765.00; Hours: 3.5**

49. During the Compensation Period, Brown Rudnick reviewed the Oversight Board's October status report concerning anticipated timing of plan confirmation and attended a hearing regarding the same and related litigation settlement progress.

### **Presumptive Standards**

50. In accordance with the presumptions set forth in the *Order on Fee Examiner's Motion to Impose Presumptive Standards and Timeliness Requirements for Professional Fee Applications* [Docket No. 3932] (the "Presumptive Standards Order"), Brown Rudnick provides the following summary regarding the attendance of Brown Rudnick professionals at Court hearings and meetings:

- October 28th hearing: Tristan Axelrod attended the October 28, 2020 omnibus hearing regarding, among other things, plan timing and mediation progress issues.
- Weekly Client Calls: Brown Rudnick conducted periodic calls with the Special Claims Committee members to provide periodic status reports and to make recommendations as to certain courses of action. These calls were primarily conducted by a combination of Edward Weisfelner and Sunni Beville, the primary leaders of the Brown Rudnick team. Other attorneys attended only the portions of a call that required their input on specific topics.

### **Actual and Necessary Disbursements**

51. As set forth in the Summary Cover Sheet filed contemporaneously with this Application, Brown Rudnick disbursed \$2,238.65 as expenses incurred in providing professional services during the Compensation Period. Brown Rudnick passes through all out-of-pocket expenses at actual cost. Other reimbursable expenses (whether the service is performed by Brown Rudnick in-house or through a third-party vendor) include, but are not limited to, deliveries, court costs, transcript fees, travel, teleconferencing, and clerk fees, and are passed through at cost. Brown Rudnick does not bill for secretarial overtime or other administrative costs.

52. Brown Rudnick submits that the actual expenses incurred for which reimbursement is sought in this Application were necessary, reasonable, and justified under the circumstances to serve the needs of the Oversight Board at the time such expenses were incurred.

**The Application Should be Granted**

53. Section 317 of PROMESA provides for interim compensation of professionals and incorporates the substantive standards of Section 316 of PROMESA to govern the Court's award of such compensation. 48 U.S.C. § 2177. Section 316 provides that a court may award a professional employed under section 1103 of title 11 of the United States Code "reasonable compensation for actual, necessary services rendered . . . and reimbursement for actual, necessary expenses." *Id.* § 2176(a)(1) and (2). Section 316(c) sets forth criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded to a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

- (1) the time spent on such services;
- (2) the rates charged for such services;
- (3) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this chapter;
- (4) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (5) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the restructuring field; and
- (6) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title or title 11, United States Code.

*Id.* § 2176(c).

54. Brown Rudnick respectfully submits that the services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Seventh Interim Application were necessary and beneficial to the Oversight Board. In light of the nature, extent and value of such services, Brown Rudnick submits that the compensation requested herein is reasonable.

55. The compensation for Brown Rudnick's services as requested is commensurate with the complexity, importance and nature of the problems, issues or tasks involved. The professional services were performed with expedition and in an efficient manner.

56. In sum, the services rendered by Brown Rudnick were necessary and beneficial to the Oversight Board, were reasonable in light of the value of such services to the Oversight Board and were performed with skill and expertise. Accordingly, Brown Rudnick submits that approval of the compensation for professional services and reimbursement of expenses requested in this Seventh Interim Fee Application is warranted.

#### **Location of Services Provided**

57. All fees and services during this Compensation Period were rendered and incurred outside of Puerto Rico.

#### **Statements Pursuant to Appendix B of the U.S. Trustee Guidelines**

58. The following statements address information pursuant to Section C.5 of the U.S. Trustee Guidelines:

- a. **Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

**Answer:** Yes, in accordance with the Services Agreement, Brown Rudnick's standard hourly rates in these cases have been reduced so that the hourly rate for all attorneys is \$790, and \$270 for all paralegals and non-lawyer staff. In addition, after discussion with the client, we charged our standard hourly rate of \$90 for litigation analysts.

- b. **Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Answer:** No. The client was aware and involved in the myriad of case issues and directed Brown Rudnick as to the services provided. In addition, the client reviewed and approved each of our monthly fee invoices, which reflected the volume of work reflected herein.

- c. **Question:** Have any of the professionals included in this fee application varied their hourly rate based on geographic location of the bankruptcy case?

**Answer:** No.

- d. **Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

**Answer:** No.

- e. **Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Answer:** No.

- f. **Question:** If the fee application includes any rate increases in retention: (i) did your client review and approve those rate increases in advance? and (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

**Answer:** The Application does not include any additional rate increases.

### **Notice**

59. Notice of this Application has been provided to: (a) the United States Trustee for the District of Puerto Rico, (b) the Oversight Board and its counsel, (c) counsel to AAFAF, (d) counsel to the Fee Examiner, (e) counsel to the Official Committee of Unsecured Creditors, (f) counsel to the Official Committee of Retirees, and (g) the Puerto Rico Department of Treasury. Brown Rudnick respectfully submits that no further notice of this Application should be required.

**No Prior Request**

60. No prior interim fee application for the relief requested herein has been made to this or any other Court.

**Conclusion**

WHEREFORE, Brown Rudnick respectfully requests that the Court enter an order; (a) approving the interim allowance of \$612,405.00 for compensation for professional services rendered during the Compensation Period, (b) approving the reimbursement of Brown Rudnick's out-of-pocket expenses incurred in connection with the rendering of such services during the Compensation Period in the amount of \$2,238.65, (c) authorizing payment of the outstanding fees in the aggregate amount of \$69,507.97, and (d) granting such other and further relief as the Court deems just and proper.

New York, New York  
Dated: July 21, 2021

/s/ Sunni P. Beville  
BROWN RUDNICK LLP  
Sunni P. Beville, Esq. (admitted *pro hac vice*)  
Tristan G. Axelrod, Esq. (admitted *pro hac vice*)  
One Financial Center  
Boston, MA 02111  
Tel: (617) 856-8200  
sbeville@brownrudnick.com  
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Stephen A. Best, Esq. (admitted *pro hac vice*)  
601 Thirteenth Street NW, Suite 600  
Washington, D.C. 20005  
sbest@brownrudnick.com

*Counsel to the Financial Oversight and Management Board,  
acting through the Special Claims Committee*

and

/s/ Alberto Estrella  
/s/ Kenneth C. Suria  
ESTRELLA, LLC  
Alberto Estrella (USDC-PR 209804)  
Kenneth C. Suria (USDC-PR 213302)  
P. O. Box 9023596  
San Juan, Puerto Rico 00902-3596  
Tel.: (787) 977-5050  
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agestrella@estrellallc.com  
kcsuria@estrellallc.com

*Local Counsel to the Financial Oversight and Management  
Board, acting through the Special Claims Committee*

**EXHIBIT A**

**CERTIFICATION OF SUNNI P. BEVILLE  
IN SUPPORT OF THE APPLICATION**



Hearing Date: TBD  
Objection Deadline: August 11, 2021 at 4:00 p.m. AST

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
TITLE III

No. 17-BK-03283 (LTS)

(Jointly Administered)

**CERTIFICATION OF SUNNI P. BEVILLE IN SUPPORT OF  
SEVENTH INTERIM APPLICATION OF  
BROWN RUDNICK LLP, CLAIMS COUNSEL TO THE  
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE,  
FOR PROFESSIONAL COMPENSATION AND REIMBURSEMENT  
OF EXPENSES FOR THE ELEVENTH INTERIM FEE PERIOD  
FROM OCTOBER 1, 2020 THROUGH JANUARY 31, 2021**

I, Sunni P. Beville, hereby certify that:

1. I am an attorney admitted to practice in the Commonwealth of Massachusetts and am admitted *pro hac vice* before this Court. I am a member of the law firm of Brown Rudnick LLP (“Brown Rudnick”), with offices located at Seven Times Square, New York, New York 10036 and One Financial Center, Boston, Massachusetts 02111. Brown Rudnick is claims counsel to the Financial Oversight and Management Board, acting through its Special Claims Committee (the “Oversight Board”) as representative of the Debtors in the above-captioned title III cases pursuant

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”).<sup>2</sup> I have personal knowledge of all of the facts set forth in this certification except as expressly stated herein.

2. In accordance with (a) Local Bankruptcy Rule 2016-1 (the “Local Guidelines”), (b) Appendix B of the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330*, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”), and (c) the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* entered June 6, 2018 (the “Interim Compensation Order”), this certification is made with respect to the Seventh Interim Application of Brown Rudnick LLP, as claims counsel to the Oversight Board, dated July 21, 2021 (the “Application”),<sup>3</sup> for interim compensation and reimbursement of expenses for the period of October 1, 2020 through and including January 31, 2021 (the “Compensation Period”).

3. With respect to section (a)(4) of the Local Guidelines, I certify that:

- a. I have read the Application;
- b. to the best of my knowledge, information, and belief, formed after reasonable inquiry, the compensation and reimbursement of expenses sought conforms with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the U.S. Trustee Guidelines and these Local Guidelines;
- c. except to the extent that fees or disbursements are prohibited by the Local Guidelines, the compensation and reimbursement of expenses requested are billed in accordance with the Services Agreement. Brown Rudnick’s hourly rate for all attorneys in these cases is \$790, and \$270 for all paralegals and other non-lawyer staff; and
- d. in providing a reimbursable service, Brown Rudnick does not make a profit on that service, whether the service is performed by Brown Rudnick in-house or through a third party.

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<sup>2</sup> PROMESA has been codified in 48 U.S.C. §§ 2101-2241.

<sup>3</sup> Capitalized terms used but not defined herein have the meanings given to them in the Application.

Dated: July 21, 2021  
Boston, Massachusetts

Respectfully submitted,

/s/ Sunni P. Beville

Sunni P. Beville (admitted *pro hac vice*)

**BROWN RUDNICK LLP**

One Financial Center  
Boston, Massachusetts 02111  
Telephone: (617) 856-8200  
Facsimile: (617) 856-8201  
sbeville@brownrudnick.com

**EXHIBIT B**

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE PERIOD FROM OCTOBER 1, 2020 THROUGH JANUARY 31, 2021**

**EXHIBIT B**

Summary of Hours Billed by Professionals and Paraprofessionals  
for the Period from October 1, 2020 through January 31, 2021

<b>Partners and Of Counsel</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Sunni P. Beville	Partner; Admitted to Massachusetts Bar in 2002; Restructuring	\$790.00	19.7	\$15,563.00
Cathrine M. Castaldi	Partner; Admitted to California Bar in 1991; Restructuring	\$790.00	.3	\$237.00
Edward S. Weisfelner	Partner; Admitted to New York Bar in 1983; Restructuring	\$790.00	3.6	\$2,844.00
<b>TOTAL</b>			<b>23.6</b>	<b>\$18,644.00</b>

<b>Associates</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Tristan G. Axelrod	Associate; Admitted to Massachusetts Bar in 2014; Restructuring	\$790.00	155.8	\$123,082.00
Blair M. Rinne	Associate; Admitted to Massachusetts Bar in 2014; Litigation	\$790.00	94.3	\$74,497.00
Matthew A. Sawyer	Associate; Admitted to Massachusetts Bar in 2019; Restructuring	\$790.00	473.3	\$373,907.00
<b>TOTAL</b>			<b>723.4</b>	<b>\$571,486.00</b>

<b>Paralegals and Research Assistants</b>	<b>Year(s) Admitted to Bar; Position; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Elizabeth G. Hosang	N/A; Paralegal with over 20 years' experience; Litigation	\$270.00	.2	\$54.00
Harriet E. Cohen	N/A; Paralegal with over 30 years' experience; Restructuring	\$270.00	52.3	\$14,121.00
Alexandra M. Deering	N/A; Paralegal with over 5 years' experience; Restructuring	\$270.00	30.0	\$8,100.00
<b>TOTAL</b>			<b>82.5</b>	<b>\$22,275.00</b>
<b>GRAND TOTAL</b>			<b>829.5</b>	<b>\$612,405.00</b>

**EXHIBIT C**

**SUMMARY OF COMPENSATION BY MATTER FOR THE PERIOD  
FROM OCTOBER 1, 2020 THROUGH JANUARY 31, 2021**



**EXHIBIT C**

Summary of Compensation by Matter for the Period  
from October 1, 2021 through January 31, 2021

<b><u>Task Code</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>	<b><u>Costs</u></b>	<b><u>Total Amount</u></b>
General /Costs Only	0.00	\$0.00	\$2,238.65	\$2,238.65
Case Administration	1.8	\$486.00	\$0.00	\$486.00
Meetings and Communications with Client	12.3	\$9,717.00	\$0.00	\$9,717.00
Fee Applications	53.1	\$14,753.00	\$0.00	\$14,753.00
General Investigation	1.3	\$1,027.00	\$0.00	\$1,027.00
Avoidance Actions	754.6	\$581,366.00	\$0.00	\$581,366.00
Third Party Claims	2.9	\$2,291.00	\$0.00	\$2,291.00
Plan and Disclosure Statement	3.5	\$2,765.00	\$0.00	\$2,765.00
<b>TOTAL</b>	<b>829.5</b>	<b>\$612,405.00</b>	<b>\$2,238.65</b>	<b>\$614,643.65</b>

**EXHIBIT D**

**SUMMARY OF BLENDED HOURLY RATES  
AND COMPARABLE HOURLY RATES**

**EXHIBIT D**

Summary of Blended Hourly Rates and Comparable Hourly Rates

Category of Timekeeper	Blended Hourly Rate	
	Billed in this Fee Application <sup>1</sup>	Billed for 2020 (excluding bankruptcy)
Partners	\$790	\$782
Associates	\$790	\$527
Paralegals	\$270	\$328
<b>All Timekeepers</b>	<b>\$739</b>	<b>\$668</b>

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<sup>1</sup> The Blended Hourly Rates include write-downs that have been factored into the calculations.

**EXHIBIT E**

**SUMMARY OF REIMBURSABLE EXPENSES INCURRED  
FOR THE PERIOD OCTOBER 1, 2020 THROUGH JANUARY 31, 2021**

**EXHIBIT E**

Summary of Reimbursable Expenses Incurred  
for the Period October 1, 2020 through January 31, 2021

<u>Service</u>	<u>Cost</u>
Photocopy (In-house) (449 pages x 10¢)	\$44.90
Research (On-line Actual Costs) – Westlaw	\$1,660.00
PACER	\$470.70
Overnight Delivery	\$30.00
Teleconferencing	\$33.05
<b>TOTAL</b>	<b>\$2,238.65</b>

**EXHIBIT F**

**BUDGET PLAN AND COMPARATIVE ANALYSIS**

	Budgeted		Actual		Budgeted		Actual		Budgeted		Actual		Budgeted		Actual	
Project Categories	Hours Estimate (October 2020)	Time Value Estimate (October 2020)	Hours (October 2020)	Time Value (October 2020)	Hours Estimate (November 2020)	Time Value Estimate (November 2020)	Hours (November 2020)	Time Value (November 2020)	Hours Estimate (December 2020)	Time Value Estimate (December 2020)	Hours (December 2020)	Time Value (December 2020)	Hours Estimate (January 2021)	Time Value Estimate (January 2021)	Hours (January 2021)	Time Value (January 2021)
Case Administration	10.0	\$7,900.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00	5.0	\$3,950.00	1.8	\$486.00	0.0	\$0.00	0.0	\$0.00
Meetings and Communications with Client	10.0	\$7,900.00	7.4	\$5,846.00	20.0	\$15,800.00	1.2	\$948.00	10.0	\$7,900.00	0.7	\$553.00	5.0	\$3,950.00	3.0	\$2,370.00
Fee Applications	5.0	\$2,500.00	5.9	\$1,593.00	25.0	\$12,500.00	14.3	\$3,861.00	25.0	\$12,500.00	11.7	\$3,159.00	25.0	\$12,500.00	21.2	\$6,140.00
General Investigation	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	1.3	\$1,027.00
Hearings	5.0	\$3,950.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00
Non-Working Travel	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
ERS	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
PREPA	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
GO Bonds / Debt Limit	0.0	\$0.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00	5.0	\$3,950.00	0.0	\$0.00
Swaps	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
Credit Rating Agencies	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
COFINA	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
Avoidance Actions	200.0	\$158,000.00	202.8	\$155,844.00	150.0	\$118,500.00	227.9	\$176,037.00	175.0	\$138,250.00	183.7	\$139,507.00	225.0	\$177,750.00	140.2	\$109,978.00
Referrals	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
Third Party Claims	10.0	\$7,900.00	0.0	\$0.00	5.0	\$3,950.00		\$0.00	5.0	\$3,950.00	2.4	\$1,896.00	5.0	\$3,950.00	0.5	\$395.00
Adversary Proceedings	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
Plan and Disclosure Statement	5.0	\$3,950.00	3.5	\$2,765.00	5.0	\$3,950.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00	0.0	\$0.00
	245.0	\$192,100.00	219.6	\$166,048.00	220.0	\$166,550.00	243.4	\$180,846.00	230.0	\$174,450.00	200.3	\$145,601.00	270.0	\$206,050.00	166.2	\$119,910.00

**EXHIBIT G-1**

**TWENTY-THIRD MONTHLY FEE STATEMENT  
(OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020)**



**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III  
Case No. 17-BK-3283 (LTS)

(Jointly Administered)

**TWENTY-THIRD MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP,  
CLAIMS COUNSEL FOR THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
FOR SERVICES AND DISBURSEMENTS FOR THE PERIOD OF  
OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020**

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Commonwealth of Puerto Rico, *et al.*

November 20, 2020

FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

Client Ref. No. 35179

Invoice Nos. 6908235 and 6908236

Re: The Financial Oversight and Management Board for Puerto Rico,  
as representative of The Commonwealth of Puerto Rico, *et al.*  
Debtors under Title III  
October 1, 2020 – October 31, 2020

Professional services rendered by Brown Rudnick LLP,  
Claims Counsel for The Financial Oversight and Management Board for Puerto Rico, acting  
through its Special Claims Committee

**Total Amount of Compensation for Professional Services** **\$166,048.00**

Less Holdback as per Court Order dated June 6, 2018 [Docket No. 3269] (10%)	\$16,604.80
Interim Compensation for Professional Services (90%)	\$149,443.20
Plus Reimbursement for Actual and Necessary Expenses	\$324.95
Total Requested Payment Less Holdback <sup>2</sup>	<b>\$149,768.15</b>

<sup>2</sup> Brown Rudnick LLP reserves the right to include a gross-up amount in its interim fee application relating to any professional fee tax that is imposed on Brown Rudnick LLP. Brown Rudnick will endeavor to make any such gross-up consistent with the discussion reflected at the hearing conducted by Judge Swain on December 19, 2018 addressing the fee examiner's proposed additional presumptive standards and with any recommendation made by the fee examiner and as may be approved by the Court.

**FEE STATEMENT INDEX**

<b>Exhibit A</b>	<b>Summary of Fees and Costs by Task Code</b>
<b>Exhibit B</b>	<b>Summary of Hours and Fees by Professional</b>
<b>Exhibit C</b>	<b>Summary of Costs</b>
<b>Exhibit D</b>	<b>Time Entries for Each Professional by Task Code (Invoices)</b>

**EXHIBIT A**

<b><u>Task Code</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>	<b><u>Costs</u></b>	<b><u>Total Amount</u></b>
General /Costs Only	0.0	\$0.00	\$324.95	\$324.95
Meetings and Communications with Client	7.4	\$5,846.00	\$0.00	\$5,846.00
Fee Applications	5.9	\$1,593.00	\$0.00	\$1,593.00
Avoidance Actions	202.8	\$155,844.00	\$0.00	\$155,844.00
Plan and Disclosure Statement	3.5	\$2,765.00	\$0.00	\$2,765.00
<b>TOTAL</b>	<b>219.6</b>	<b>\$166,048.00</b>	<b>\$324.95</b>	<b>\$166,372.95</b>

**EXHIBIT B**

**SERVICES RENDERED BY  
BROWN RUDNICK LLP**

**COMMENCING OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020**

**TIME AND COMPENSATION BREAKDOWN**

<b>Partners and Of Counsel</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Sunni P. Beville	Partner; Admitted to Massachusetts Bar in 2002; Restructuring	\$790.00	6.7	\$5,293.00
Edward S. Weisfelner	Partner, Admitted to New York Bar in 1983; Restructuring	\$790.00	3.0	\$2,370.00
<b>TOTAL</b>			<b>9.7</b>	<b>\$7,663.00</b>

<b>Associates</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Tristan G. Axelrod	Associate; Admitted to Massachusetts Bar in 2014; Restructuring	\$790.00	29.8	\$23,542.00
Blair Rinne	Associate; Admitted to Massachusetts Bar in 2014; Litigation	\$790.00	35.8	\$28,282.00
Matthew Sawyer	Associate; Admitted to Massachusetts Bar in 2019; Restructuring	\$790.00	130.0	\$102,700.00
<b>TOTAL</b>			<b>195.6</b>	<b>\$154,524.00</b>

<b>Paralegals and Other Professionals</b>	<b>Position; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Harriet E. Cohen	N/A; Paralegal with over 30 years' experience; Restructuring	\$270.00	5.9	\$1,593.00
Alexandra M. Deering	N/A; Paralegal with over 5 years' experience; Restructuring	\$270.00	8.4	\$2,268.00
<b>TOTAL</b>			<b>14.3</b>	<b>\$3,861.00</b>
<b>GRAND TOTAL</b>			<b>219.6</b>	<b>\$166,048.00</b>

**EXHIBIT C**

**ACTUAL AND NECESSARY COSTS INCURRED BY  
BROWN RUDNICK LLP COMMENCING  
OCTOBER 1, 2020 THROUGH OCTOBER 31, 2020**

<u>Service</u>	<u>Cost</u>
Copies	\$27.20
Pacer	\$22.70
Teleconferencing	\$33.05
Westlaw Online	\$242.00
<b>TOTAL</b>	<b>\$324.95</b>



brownrudnick

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6908236  
Date Nov 19, 2020  
Client 035179

RE: COSTS

INVOICE

For professional services rendered in connection with the above captioned matter  
through October 31, 2020:

Matter No.	Matter Name	Fees	Costs	Total
035179.0001	COSTS	0.00	324.95	324.95
Total		0.00	324.95	324.95

Total Current Fees	\$0.00
Total Current Costs	\$324.95
<b>Total Invoice</b>	<b>\$324.95</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
RE: COSTS  
November 19, 2020

Invoice 6908236

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## COST DETAIL

Date	Description	Value
09/15/20	TELECONFERENCING	17.30
09/22/20	DOCUMENT PRODUCTION	0.00
09/22/20	TELECONFERENCING	5.14
09/24/20	DOCUMENT PRODUCTION	0.00
09/25/20	TELECONFERENCING	7.84
09/30/20	TELECONFERENCING	2.77
10/01/20	PACER	11.30
10/01/20	PACER	1.10
10/01/20	PACER	9.10
10/01/20	PACER	1.20
10/05/20	DOCUMENT PRODUCTION	0.00
10/05/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
10/05/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
10/05/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	80.00
10/06/20	DOCUMENT PRODUCTION	0.00
10/06/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	6.00
10/06/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	65.00
10/06/20	DOCUMENT PRODUCTION	0.00
10/07/20	DOCUMENT PRODUCTION	0.00
10/07/20	DOCUMENT PRODUCTION	0.00
10/07/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
10/07/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	10.00
10/08/20	DOCUMENT PRODUCTION	0.00
10/09/20	DOCUMENT PRODUCTION	0.00
10/12/20	DOCUMENT PRODUCTION	0.00
10/12/20	DOCUMENT PRODUCTION	0.00
10/12/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
10/12/20	DOCUMENT PRODUCTION	0.00
10/13/20	DOCUMENT PRODUCTION	0.00
10/14/20	DOCUMENT PRODUCTION	0.00
10/14/20	DOCUMENT PRODUCTION	0.00
10/16/20	COPIES	0.40
10/16/20	COPIES	1.00
10/16/20	COPIES	1.00



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
 CLAIMS COMMITTEE  
 RE: COSTS  
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Invoice 6908236

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Date	Description	Value
10/16/20	COPIES	0.60
10/16/20	COPIES	0.60
10/16/20	COPIES	1.60
10/16/20	COPIES	1.60
10/16/20	COPIES	0.10
10/16/20	COPIES	1.00
10/16/20	COPIES	1.00
10/16/20	COPIES	2.40
10/16/20	COPIES	1.00
10/16/20	COPIES	1.00
10/16/20	COPIES	0.40
10/16/20	DOCUMENT PRODUCTION	0.00
10/16/20	DOCUMENT PRODUCTION	0.00
10/16/20	DOCUMENT PRODUCTION	0.00
10/16/20	DOCUMENT PRODUCTION	0.00
10/16/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	20.00
10/16/20	DOCUMENT PRODUCTION	0.00
10/19/20	COPIES	2.20
10/19/20	COPIES	6.20
10/19/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
10/20/20	DOCUMENT PRODUCTION	0.00
10/23/20	COPIES	3.30
10/23/20	COPIES	1.70
10/23/20	COPIES	0.10
10/23/20	DOCUMENT PRODUCTION	0.00
10/24/20	DOCUMENT PRODUCTION	0.00
10/27/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
10/27/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	40.00
10/27/20	DOCUMENT PRODUCTION	0.00
10/28/20	DOCUMENT PRODUCTION	0.00
10/30/20	DOCUMENT PRODUCTION	0.00
<b>Total Costs</b>		<b>324.95</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
RE: COSTS  
November 19, 2020

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**C O S T S U M M A R Y**

<b>Description</b>	<b>Value</b>
DOCUMENT PRODUCTION	0.00
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	242.00
TELECONFERENCING	33.05
DOCUMENT PRODUCTION	0.00
PACER	22.70
COPIES	27.20
<b>Total Costs</b>	<b>324.95</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6908236
Date	Nov 19, 2020
Client	035179

RE: COSTS

**Remittance** 

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**Balance Due: \$324.95**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**EXHIBIT D**

**Time Entries for Each Professional By Task Code (Invoice)**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6908235  
Date Nov 19, 2020  
Client 035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

## INVOICE

For professional services rendered in connection with the above captioned matter  
through October 31, 2020:

Matter No.	Matter Name	Fees	Costs	Total
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	5,846.00	0.00	5,846.00
035179.0004	FEE APPLICATIONS	1,593.00	0.00	1,593.00
035179.0015	AVOIDANCE ACTIONS	155,844.00	0.00	155,844.00
035179.0019	PLAN AND DISCLOSURE STATEMENT	2,765.00	0.00	2,765.00
<b>Total</b>		<b>166,048.00</b>	<b>0.00</b>	<b>166,048.00</b>

Total Current Fees \$166,048.00

Total Current Costs \$0.00

**Total Invoice \$166,048.00**

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6908235  
Date Nov 19, 2020  
Client 035179

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through October 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	5,846.00	0.00	5,846.00
<b>Total</b>		<b>5,846.00</b>	<b>0.00</b>	<b>5,846.00</b>

Total Current Fees \$5,846.00

Total Current Costs \$0.00

**Total Invoice \$5,846.00**





RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

TIME DETAIL

Date	Professional	Description	Hours
10/02/20	BEVILLE	TELEPHONE CONFERENCE WITH J. EL KOURY REGARDING PREPA FUEL OIL LITIGATION	0.10
10/06/20	BEVILLE	CORRESPONDENCE TO CLIENTS REGARDING POSTPONEMENT OF MEETING	0.10
10/07/20	WEISFELNER	REVIEW INFORMATION ON NEW PRESIDENTIAL APPOINTMENT	0.20
10/12/20	BEVILLE	CORRESPONDENCE REGARDING AGENDA FOR SPECIAL CLAIMS COMMITTEE MEETING (.2); CORRESPONDENCE TO J. EL KOURY REGARDING BOARD COMPOSITION / ATTENDANCE AT SCC MEETINGS (.1)	0.30
10/13/20	BEVILLE	CORRESPONDENCE REGARDING AGENDA FOR CLIENT CALL (.1); LEAD TELEPHONIC MEETING WITH SPECIAL CLAIMS COMMITTEE (.5)	0.60
10/13/20	SAWYER	CALL WITH SCC RE VENDOR ACTION STATUS UPDATE AND PREPA FUEL OIL LITIGATION STATUS UPDATE	0.60
10/13/20	WEISFELNER	PREPARE FOR AND PARTICIPATE IN WEEKLY SCC CALL TO ADDRESS CURRENT STATUS OF FUEL OIL LITIGATION ISSUES	0.90
10/20/20	WEISFELNER	PREPARE FOR AND PARTICIPATE IN WEEKLY CALL WITH SPECIAL CLAIMS COMMITTEE COMPTROLLERS REPORT RE MONEYS MIS-SPENT BY PREPA; ATTENTION TO INVESTIGATION OF TRADING ISSUES AND RELATED MATTERS	1.30
10/20/20	AXELROD	CALL WITH SCC	0.50
10/20/20	BEVILLE	PREPARE FOR CLIENT MEETING (.2); LEAD CONFERENCE CALL WITH SPECIAL CLAIMS COMMITTEE (.4)	0.60
10/20/20	SAWYER	CALL WITH SCC RE STATUS UPDATE OF FUEL OIL LITIGATION, PREPA AUDIT, AND DOE SALARY PAYMENTS	0.40
10/23/20	WEISFELNER	PREPARE FOR AND PARTICIPATE IN C/C WITH FOMB AND MARRENO PLAINTIFFS' COUNSEL TO DISCUSS NEXT STEPS AND REACTION TO UCC'S POSITION RE PREPA FUEL OIL LITIGATION	0.60
10/26/20	BEVILLE	ANALYSIS REGARDING LITIGATION SUMMARY FOR OVERSIGHT BOARD	0.40
10/26/20	AXELROD	MEMO TO CLIENT RE LITIGATION ACTIVITIES AND STATUS	0.60
10/27/20	BEVILLE	CORRESPONDENCE REGARDING LITIGATION SUMMARY MEMORANDUM	0.20
<b>Total Hours</b>			<b>7.40</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
November 19, 2020

Invoice 6908235  
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TIME SUMMARY

Professional	Hours		Rate	Value
SUNNI P. BEVILLE	2.30	hours at	790.00	1,817.00
TRISTAN G. AXELROD	1.10	hours at	790.00	869.00
MATTHEW A. SAWYER	1.00	hours at	790.00	790.00
EDWARD S. WEISFELNER	3.00	hours at	790.00	2,370.00
<b>Total Fees</b>				<b>5,846.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
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TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6908235  
Date Nov 19, 2020  
Client 035179

RE: FEE APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through October 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0004	FEE APPLICATIONS	1,593.00	0.00	1,593.00
<b>Total</b>		<b>1,593.00</b>	<b>0.00</b>	<b>1,593.00</b>

Total Current Fees \$1,593.00

Total Current Costs \$0.00

**Total Invoice \$1,593.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
November 19, 2020

Invoice 6908235

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RE: FEE APPLICATIONS

## TIME DETAIL

Date	Professional	Description	Hours
10/01/20	COHEN	SEND SEPTEMBER DRAFT BUDGETS TO S. BEVILLE	0.30
10/07/20	COHEN	PREPARE CARDONA SEPTEMBER INVOICE FOR REVIEW AND SEND TO J. EL KOURY (.2); WORK ON TITLE III DECLARATIONS FOR BROWN RUDNICK AUGUST STATEMENTS (.6)	0.80
10/08/20	COHEN	FINALIZE AND SUBMIT TITLE III DECLARATIONS FOR BROWN RUDNICK AUGUST STATEMENTS	0.60
10/12/20	COHEN	SUBMIT CARDONA AND DICICCO GULMAN MONTHLY FEE STATEMENTS (.6); EMAILS WITH V. BLAY SOLER AND STRATEGIZE REGARDING SAME (.3)	0.90
10/13/20	COHEN	REVIEW DATA AND DOCUMENTS, EMAIL TO V. BLAY SOLER	0.30
10/19/20	COHEN	REVIEW AND SEND REQUESTED DOCUMENT TO S. BEVILLE (.2); STRATEGIZE REGARDING STATUS AND MONTHLY FEE APPLICATIONS (.2)	0.40
10/21/20	COHEN	STRATEGIZE REGARDING CARDONA SUBMISSIONS AND MONTHLY FEE APPLICATION STATUS	0.40
10/22/20	COHEN	REVIEW STATUS AND EMAILS TO S. BEVILLE	0.20
10/23/20	COHEN	STRATEGIZE AND EMAILS WITH S. BEVILLE REGARDING, BUDGETS, MONTHLY STATEMENTS AND INTERIM FEE APPLICATIONS (.7); WORK ON SEPTEMBER MONTHLY FEE STATEMENTS (.4); SUBMIT CARDONA NO OBJECTION STATEMENTS FOR SEPTEMBER (.4); EMAILS TO V. BLAY SOLER AND C. BURKE (.2)	1.70
10/27/20	COHEN	EMAILS TO V. BLAY SOLER AND STRATEGIZE REGARDING STATUS	0.30
<b>Total Hours</b>			<b>5.90</b>

## TIME SUMMARY

Professional	Hours	Rate	Value
HARRIET E. COHEN	5.90 hours at	270.00	1,593.00
<b>Total Fees</b>			<b>1,593.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6908235  
Date Nov 19, 2020  
Client 035179

RE: AVOIDANCE ACTIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through October 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0015	AVOIDANCE ACTIONS	155,844.00	0.00	155,844.00
<b>Total</b>		<b>155,844.00</b>	<b>0.00</b>	<b>155,844.00</b>

Total Current Fees \$155,844.00

Total Current Costs \$0.00

**Total Invoice \$155,844.00**



RE: AVOIDANCE ACTIONS

## TIME DETAIL

Date	Professional	Description	Hours
10/01/20	RINNE	CORRESPOND WITH T. AXELROD AND M. SAWYER REGARDING PREFERENCE CLAIMS	0.20
10/01/20	SAWYER	REVIEW GENESIS DECISION RE PREPARE FOR CALL WITH FA AND UCC COUNSEL RE SAME (.3); CALL RE SAME (.5)	0.80
10/01/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	5.60
10/01/20	AXELROD	ANALYZE ORDINARY COURSE DEFENSE ISSUE	0.70
10/01/20	SAWYER	CALL WITH C. INFANTE AND K. SURIA RE PR LAW 172 AND OTHER OUTSTANDING ITEMS IN VENDOR AVOIDANCE ACTIONS	0.60
10/02/20	RINNE	WEEKLY STRATEGY CALL WITH DGC, M. SAWYER, AND T. AXELROD REGARDING OUTSTANDING DEFAULT DEFENDANT ISSUES (.8); CORRESPOND WITH UCC COUNSEL REGARDING APPROVAL OF DRAFTS, CORRESPONDING WITH S. BEVILLE, AND STRATEGIZE WITH T. AXELROD AND M. SAWYER REGARDING SAME (.6); ANALYZE OUTSTANDING DEFAULT DEFENDANT ISSUES (.3)	1.70
10/02/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	2.60
10/02/20	SAWYER	MEETING WITH TEAM AND FA RE OUTSTANDING ACTION ITEMS IN VENDOR AVOIDANCE ACTIONS (.8); DRAFT STATUS SUMMARY OF VENDORS IN QUEUE, OUTSTANDING ACTION ITEMS, OPEN QUESTIONS, AND NEXT STEPS AND SEND TO FA AND T. AXELROD FOR REVIEW AND COMMENT (2.7)	3.50
10/02/20	AXELROD	CALL WITH DGC RE FRAUDULENT TRANSFER DILIGENCE (.5); EMAILS WITH ESTRELLA RE ERS CLAWBACK STATUS (.2); REVIEW PRHS DISMISSAL ORDER (.2)	0.90
10/03/20	SAWYER	REVIEW AND REVISE MOTION FOR ENTRY OF DEFAULT RE ESTRADA MAISONET	0.30
10/03/20	SAWYER	EMAIL CORRESPONDENCE WITH FA RE OUTSTANDING ACTION ITEMS IN VENDOR AVOIDANCE ACTIONS	0.20
10/04/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.60
10/05/20	SAWYER	CONTINUE RESEARCH RE PROPERTY OF THE ESTATE (2.7); DRAFT MEMO RE SAME (1.4)	4.10
10/05/20	SAWYER	CONTINUE REVISIONS TO MOTION FOR ENTRY OF DEFAULT RE AP 227 (1.2); FACILITATE EXECUTION OF FILING RE SAME (.2)	1.40



Date	Professional	Description	Hours
10/05/20	AXELROD	EMAILS WITH UCC RE PREFERENCE ANALYSIS (.4); REVIEW UNDERWRITER COMPLAINT AND RESPOND TO PROSKAUER QUERY RE SAME AND RELATED AVOIDANCE ISSUES (.3)	0.70
10/05/20	RINNE	CORRESPOND WITH LOCAL COUNSEL REGARDING EXTENSION MOTION AND COMPTROLLER CERTIFICATES AND TRANSLATIONS NEEDED FOR DEFAULT JUDGMENT MOTIONS (.4); ANALYZE FILES FROM LOCAL COUNSEL AND COORDINATING DGC REVIEW (.8); REVISE DEFAULT JUDGMENT MOTION PAPER PER INSTRUCTION FROM UCC COUNSEL (.2)	1.40
10/06/20	RINNE	ANALYZE NEW CERTIFICATES FROM COMPTROLLER'S OFFICE AND THEIR TRANSLATIONS (.3); CORRESPOND WITH DGC REGARDING SAME (.2); REVISE SAMPLE MOTION FOR DEFAULT JUDGMENT (.2)	0.70
10/06/20	SAWYER	CONTINUE DRAFT RECOMMENDATION MEMO	2.70
10/06/20	SAWYER	CALL WITH B. WEXLER RE RESEARCH AND SETTLEMENT DISCUSSION STRATEGY (.2); CALL WITH T. AXELROD RE SAME (.1)	0.30
10/06/20	SAWYER	CALL WITH VENDOR AND TEAM RE PREFERENCE SETTLEMENT DISCUSSIONS (.4); FOLLOW-UP WITH B. WEXLER RE SAME (.2)	0.60
10/06/20	SAWYER	DRAFT CERTIFICATE NO OBJECTION AND PROPOSED ORDER RE CLARIFICATION MOTION RE LITIGATION DEADLINES IN VENDOR AVOIDANCE ACTIONS	0.70
10/06/20	AXELROD	CALL WITH M SAWYER AND EMAILS WITH R WEXLER RE ESC	0.40
10/07/20	RINNE	CORRESPOND WITH T. AXELROD, S. BEVILLE, AND UCC COUNSEL REGARDING DRAFT MOTIONS (.4); ANALYZE AND INCORPORATE REVISIONS TO DRAFTS FROM UCC COUNSEL (1.0)	1.40
10/07/20	SAWYER	PREPARE FOR CALL WITH C. INFANTE AND R. WEXLER RE RESEARCH (.8); CALL RE SAME (1.0)	1.80
10/07/20	SAWYER	ANALYSIS RE OUTSTANDING ITEMS IN DEFAULT VENDOR CASES AND NEXT STEPS	1.00
10/07/20	AXELROD	EMAILS AND CALLS TO IDENTIFY ACTION ITEMS AND PLAN WORKING GROUP MEETING RE NEXT STEPS	0.80
10/07/20	DEERING	REVIEW AND FILE CNO AND PROPOSED ORDER RE CLARIFICATION MOTION (.5), COORDINATE SERVICE OF SAME (.2) AND EMAILS WITH M. SAWYER RE SAME (.2)	0.90
10/08/20	RINNE	FINALIZE AND COORDINATE FILING OF MOTION TO EXTEND DEFAULT JUDGMENT DEADLINES	0.90
10/08/20	SAWYER	CONTINUE REVISIONS AND DRAFTING OF DEFENSE MEMO AND SEND SAME TO T. AXELROD FOR REVIEW (3.1) CALL WITH T. AXELROD RE SAME (.1)	3.20
10/08/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	3.90



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
November 19, 2020

Invoice 6908235

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Date	Professional	Description	Hours
10/08/20	AXELROD	REVIEW AND COMMENT RE MEMO ON PREF DEFENSE (1.0); CALL TO US ATTY OFFICE RE BDO PR (.1); REVIEW CASE UPDATES (.3); COMMENT RE STATUS OF DEFAULT CASES, EXTENSION MOTION ETC. (.2)	1.60
10/08/20	DEERING	REVIEW AND FILE SECOND EXTENSION MOTION FOR DEFAULT JUDGMENT DEADLINES (.6) AND COORDINATE SERVICE RE SAME (.3)	0.90
10/09/20	SAWYER	REVIEW REQUESTS FOR INFORMATION MADE TO VENDOR RE VENDOR AVOIDANCE ACTIONS AND EMAIL CORRESPONDENCE WITH FA RE SAME (.3); PROVIDE VENDOR'S COUNSEL WITH LIST OF SAME (.1)	0.40
10/09/20	RINNE	WEEKLY STRATEGY CALL WITH DGC REGARDING DEFAULT DEFENDANTS (.4); ANALYZE DEFAULT DEFENDANT DOCKETS REGARDING DEADLINES AND CORRESPOND WITH J. REINHARDT REGARDING SAME (.1); CORRESPOND WITH LOCAL COUNSEL REGARDING COMPTROLLER CERTIFICATES AND TRANSLATIONS NEEDED (.2)	0.70
10/09/20	SAWYER	CONTINUE REVISIONS TO RECOMMENDATION MEMOS IN VENDOR AVOIDANCE ACTIONS	3.50
10/09/20	SAWYER	MEETING WITH T. AXELROD AND FA RE OUTSTANDING ACTION ITEMS IN VENDOR AVOIDANCE ACTIONS AND STRATEGY DISCUSSION	1.00
10/09/20	AXELROD	REVIEW UPDATES RE BOARD APPOINTMENTS ETC (.3); CATCHUP CALL WITH DGC RE VENDOR ACTIONS (1.0); REVIEW AND COMMENT RE VENDOR REC MEMOS (.4)	1.70
10/10/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	1.90
10/11/20	SAWYER	REVISE DRAFT OF MEMORANDUM	2.40
10/12/20	RINNE	STRATEGIZE WITH M. SAWYER AND T. AXELROD REGARDING AGENDA FOR CALL WITH S. BEVILLE (.2); REVISE SAMPLE MOTION FOR JUDGMENT DRAFT AND PREPARING FOR UPCOMING FILING (2.6)	2.80
10/12/20	SAWYER	CONTINUE REVISIONS TO MEMORANDUM AND SEND SAME TO T. AXELROD FOR REVIEW (.5); DRAFT AGENDA FOR CALL WITH TEAM RE OUTSTANDING ITEMS IN VENDOR ACTIONS (.3); CALL WITH T. AXELROD RE SAME (.1); REVIEW PROPOSED CHANGES BY T. AXELROD RE SAME (.2)	1.10
10/12/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND PREPARE TO SEND TO UCC FOR REVIEW AND APPROVAL	2.80
10/12/20	SAWYER	EMAIL CORRESPONDENCE WITH K. SURIA AND C. INFANTE RE PR LAW 172	0.20
10/12/20	SAWYER	REVIEW NEGATIVE NEWS RE VENDORS IN AVOIDANCE ACTIONS	1.00





Date	Professional	Description	Hours
10/12/20	AXELROD	LEGAL RESEARCH RE PR FT CLAIMS (.2); REVIEW AND RESPOND TO DGC AND WORKING GROUP EMAILS RE VENDOR RECOMMENDATIONS (.3); REVIEW AND REVISE MEMO (1.5); REVIEW AND COMMENT RE RECOMMENDATION MEMOS AND MEETING AGENDA (1.5)	3.50
10/13/20	RINNE	STRATEGY REGARDING OUTSTANDING VENDOR ISSUES (.5); REVISE MOTION FOR DEFAULT JUDGMENT AND PREPARING FOR FILING (1.0)	1.50
10/13/20	SAWYER	CALL WITH TEAM RE VENDOR UPDATES INCLUDING STATUS OF ACTIONS, DEFENSE, AND DEFAULT DEFENDANTS (.6); SEND VENDOR RECOMMENDATIONS, STATE REPORT, AND STATUS UPDATE TO S. BEVILLE FOR REVIEW (.2); EMAIL CORRESPONDENCE RE SAME WITH FA AND T. AXELROD (.3)	1.10
10/13/20	SAWYER	CALL WITH B. WEXLER AND T. AXELROD RE PREPARE FOR SETTLEMENT DISCUSSIONS WITH PREFERENCE VENDOR (.2); CALL WITH VENDOR RE SAME (.4)	0.60
10/13/20	SAWYER	REVIEW STAT REPORT RE VENDOR AVOIDANCE ACTIONS (.1); EMAIL CORRESPONDENCE WITH FA RE SAME (.4)	0.50
10/13/20	SAWYER	REVIEW DRAFT JOINT STATUS REPORT CLARIFYING LITIGATION SCHEDULES IN AP 172 AND 065	0.50
10/13/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	2.40
10/13/20	AXELROD	WORKING GROUP UPDATE CALL RE OPEN VENDOR ACTION ITEMS (.6); FOLLOWUP FROM CALL, RECIRCULATE KEY DOCS (.5); PREP FOR PEARSON NEGOTIATION (.3); CALL WITH PEARSON COUNSEL (.5); CALL WITH SCC RE VENDOR ITEMS (.6); FOLLOWUP FROM SCC CALL, REVISE MEMOS (.3)	2.80
10/13/20	BEVILLE	STRATEGIZE REGARDING VARIOUS ISSUES RELATING TO VENDOR ACTIONS	0.60
10/14/20	RINNE	CALL WITH J. REINHARDT AND ANALYZE DGC ADDITIONAL ANALYSIS FOR INCLUSION IN MOTIONS FOR DEFAULT JUDGMENT (.9); CORRESPOND REGARDING FILING MOTION FOR DEFAULT DEFENDANT AND PREPARE FOR SAME (.9)	1.80
10/14/20	SAWYER	EMAIL CORRESPONDENCE WITH MULTIPLE VENDORS COUNSELS RE STATUS OF DILIGENCE ITEMS REQUESTED; SETTLEMENT OFFER	0.20
10/14/20	AXELROD	EMAILS WITH WORKING GROUP RE VENDOR ISSUES	0.20
10/15/20	RINNE	CORRESPOND WITH T. AXELROD AND S. BEVILLE REGARDING FILING MOTION FOR DEFAULT DEFENDANT AND PREPARING FOR FILING	0.90
10/15/20	SAWYER	MEETING WITH DGC RE VENDOR UPDATES AND ACTIONS ITEMS (1.0); CALL WITH T. AXELROD RE SAME (.1); DRAFT SUMMARY OF CALL AND SEND TO T. AXELROD FOR REVIEW (.2)	1.30



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Date	Professional	Description	Hours
10/15/20	AXELROD	CALL WITH DGC RE CASE ACTION ITEMS (1.1); REVIEW CASE DOCKET AND UPDATES (.3); REVIEW COMPTROLLER REPORTS AND RELATED VENDOR DOCS (.3)	1.70
10/15/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.60
10/15/20	BEVILLE	REVIEW DRAFT PREFERENCE SETTLEMENT AGREEMENT (.4); REVIEW VENDOR RECOMMENDATION MEMORANDA (.9)	1.30
10/16/20	BEVILLE	REVIEW DRAFT MOTION FOR DEFAULT JUDGMENT AND RELATED DECLARATIONS	0.90
10/16/20	RINNE	REVISE, FINALIZE, AND SERVING MOTION FOR DEFAULT JUDGMENT AGAINST VENDOR AND STRATEGIZE WITH S. BEVILLE AND M. SAWYER REGARDING SAME (7.9); ANALYZE REMAINING DEFAULT VENDOR STATUS, DOCKETS, AND CLAIMS, AND COORDINATING DRAFTING OF ADDITIONAL MOTIONS FOR DEFAULT JUDGMENT (2.8); STRATEGIZE WITH M. SAWYER REGARDING NEXT STEPS (.5)	11.20
10/16/20	SAWYER	REVIEW SETTLEMENT OFFER/ANALYSIS FROM VENDOR'S COUNSEL AND SUMMARIZE AND PROVIDE RECOMMENDATION REGARDING SAME FOR T. AXELROD	0.50
10/16/20	SAWYER	EMAIL CORRESPONDENCE WITH UCC COUNSELS RE VENDOR RECOMMENDATION MEMOS	0.40
10/16/20	SAWYER	REVIEW AND REVISE DEFAULT MOTION AND ACCOMPANYING DECLARATIONS INCLUDING CITE CHECKS RE DEFAULT VENDOR (2.0); FACILITATE FILING AND SERVICE OF SAME (1.0)	3.00
10/16/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.60
10/16/20	SAWYER	CALL WITH B. RINNE RE STATUS UPDATE IN DEFAULT VENDOR ACTIONS AND NEXT STEPS	0.60
10/17/20	SAWYER	EMAIL CORRESPONDENCE WITH FA AND T. AXELROD RE STRATEGY IN ADVANCE OF SETTLEMENT DISCUSSIONS WITH VENDORS COUNSEL	0.30
10/18/20	RINNE	CORRESPOND WITH J. KNOTT AND M. SAWYER REGARDING DEFAULT JUDGMENT PAPERS FOR NEXT VENDORS	0.20
10/19/20	RINNE	REVISE DRAFT MOTION FOR DEFAULT JUDGMENT FOR NEXT TWO DEFAULT VENDORS (2.5); CORRESPOND WITH J. KNOTT AND M. SAWYER REGARDING SAME (.4)	2.90
10/19/20	SAWYER	REVISE MOTION FOR DEFAULT DOCUMENTS RE VENDOR AVOIDANCE ACTIONS	4.00
10/19/20	SAWYER	DRAFT NOTICES OF VOLUNTARY DISMISSAL RE VENDOR AVOIDANCE ACTIONS	0.80



Date	Professional	Description	Hours
10/19/20	SAWYER	REVIEW VENDOR STATUS UPDATE, PAYMENT DISCREPANCY, AND TOLLED PARTY STATUS UPDATE FROM FA IN ADVANCE OF CALL ON 10/20	0.30
10/19/20	SAWYER	CALL WITH B. WEXLER RE EXPLANATION (.3) AND EXHIBIT 1 PAYMENT DISCREPANCY (.5); CALL WITH T. AXELROD RE SAME (.2)	1.00
10/19/20	SAWYER	DRAFT AND REVIEW RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.70
10/19/20	AXELROD	EMAILS AND CALLS RE VENDOR ISSUES AND NEXT STEPS (1.3); REVISE AND CIRCULATE TEMPLATE PREFERENCE AGREEMENT (.3); REVIEW CASE UPDATES (.1)	1.70
10/19/20	SAWYER	REVIEW PROPOSED PLAN RE VENDOR ORDINARY COURSE DEFENSE TO PREFERENCE LIABILITY	0.80
10/19/20	SAWYER	REVIEW FILINGS IN VENDORS' CHAPTER 7 CASE RE FILING OF POC	0.20
10/20/20	RINNE	ANALYZE CERTIFICATION AND TRANSLATION FOR DEFAULT DEFENDANT AND CORRESPOND WITH K. SURIA AND J. REINHARDT REGARDING SAME (.3); REVISE DRAFT MOTION FOR DEFAULT JUDGMENT PAPERS FOR NEXT DEFAULT VENDOR AND CORRESPOND WITH M. SAWYER REGARDING SAME (.3); ANALYZE EXTENSION ORDER AND COORDINATE CALENDARING OF NEXT DEADLINES (.3); CORRESPOND WITH T. AXELROD REGARDING DRAFTS AND NEXT STEPS (.2)	1.10
10/20/20	SAWYER	CALL WITH FA AND T. AXELROD RE VENDOR TOLLING AGREEMENT EXTENSIONS, EXHIBIT 1 DISCREPANCY PAYMENTS	1.00
10/20/20	SAWYER	DRAFT TALKING POINTS RE EXHIBIT 1 DISCREPANCY AND PROPOSED LANGUAGE TO INCLUDE IN RECOMMENDATION MEMOS WHERE APPLICABLE	0.70
10/20/20	SAWYER	EMAIL CORRESPONDENCE RE MOTIONS FOR DEFAULT JUDGMENT (.4); REVISE MOTION FOR DEFAULT AND ACCOMPANYING PLEADINGS RE DEFAULT VENDOR (2.7)	3.10
10/20/20	SAWYER	PREPARE FOR CALL WITH VENDOR RE SETTLEMENT DISCUSSIONS (.2); CALL RE SAME (.2)	0.40
10/20/20	SAWYER	EMAIL CORRESPONDENCE WITH LOCAL COUNSEL AND FA RE ENGAGEMENT EFFORTS FOR DISENGAGED VENDORS	0.10
10/20/20	SAWYER	EMAIL CORRESPONDENCE WITH T. AXELROD AND B. WEXLER RE PREFERENCE SETTLEMENT DISCUSSION STRATEGY AND NEXT STEPS	0.10
10/20/20	AXELROD	PREPARE FOR DGC CALL (.1); DGC CALL RE VENDOR ISSUES (1.0); CALL WITH USAT RE BDO PUERTO RICO (.1); PREP FOR SCC CALL (.6); CALL WITH ESC COUNSEL RE PREFERENCE (.3)	2.10



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Date	Professional	Description	Hours
10/20/20	DEERING	REVIEW ORDER DENYING DEFAULT JUDGMENT AND DRAFT EMAIL TO PRIMECLERK RE PROOF OF SERVICE	0.40
10/21/20	BEVILLE	ANALYSIS REGARDING ISSUES RELATING TO VENDOR ACTIONS	0.70
10/21/20	RINNE	CALL WITH T. AXELROD AND M. SAWYER REGARDING NEXT STEPS IN DEFAULT DEFENDANTS ACTIONS (.5); UPDATE TRACKER OF NEXT TASKS AND CORRESPOND WITH K. SURIA REGARDING SAME (.5); ANALYZE DRAFTS OF NEXT MOTION FOR DEFAULT JUDGMENT AND STRATEGIZE WITH M. SAWYER REGARDING SAME (.5)	1.50
10/21/20	SAWYER	CALL WITH T. AXELROD AND B. RINNE RE DEFAULT VENDOR STATUS UPDATE AND ACTION ITEMS (.5); EMAIL CORRESPONDENCE WITH B. RINNE RE DEFAULT VENDOR TRACKER AND NEXT STEPS (.3)	0.80
10/21/20	SAWYER	REVIEW NEW VALUE DEFENSE PROFFERED BY PREFERENCE VENDOR	0.70
10/21/20	SAWYER	REVISE DEFAULT VENDOR MOTION AND RELATED DOCUMENTS	1.00
10/21/20	SAWYER	EMAIL CORRESPONDENCE WITH B. WEXLER AND T. AXELROD RE STATUS UPDATE FOLLOWING VENDOR SETTLEMENT DISCUSSIONS AND RECOMMENDED NEXT STEPS (.4); EMAIL CORRESPONDENCE UPDATE OF SAME TO J. EL KOURY (.1)	0.50
10/21/20	SAWYER	CONTINUE DRAFT OF AND REVISIONS TO DEFAULT MOTION DOCUMENTS RE VENDOR AVOIDANCE ACTIONS AND SEND SAME TO S. BEVILLE FOR REVIEW	2.60
10/21/20	SAWYER	CALL WITH T. AXELROD RE STATUS UPDATE OF DEFAULT VENDORS, NEGATIVE NEWS VENDORS, AND GENERAL OUTSTANDING ITEMS IN VENDOR AVOIDANCE ACTIONS	0.50
10/21/20	SAWYER	CALL WITH B. WEXLER RE STRATEGY REGARDING PREFERENCE SETTLEMENT DISCUSSION ON 10/22 AND ADDITIONAL OUTSTANDING ITEMS IN VENDOR AVOIDANCE ACTIONS	0.40
10/21/20	AXELROD	MEETING WITH WORKING GROUP RE DEFAULT ACTIONS (.5); REVIEW AND RESPOND TO INQUIRY RE PREFERENCE DEFENSES (.2); CALL WITH M SAWYER RE VENDOR ACTION ITEMS (.6)	1.30
10/22/20	RINNE	CORRESPOND WITH LOCAL COUNSEL AND M. SAWYER REGARDING OUTSTANDING TASKS FOR DEFAULT VENDORS	0.30
10/22/20	SAWYER	PREPARE FOR SETTLEMENT DISCUSSION CALL WITH PREFERENCE VENDOR (1.5); CALL WITH VENDORS COUNSEL RE SAME (.5); CALL WITH B. WEXLER RE FOLLOW-UP AND NEXT STEPS (.2); SEND SUMMARY TO T. AXELROD OF SAME (.3)	2.50



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Date	Professional	Description	Hours
10/22/20	SAWYER	EMAIL CORRESPONDENCE WITH TEAM RE NEGATIVE NEWS SURROUNDING VENDOR	0.20
10/22/20	SAWYER	EMAIL CORRESPONDENCE WITH FA RE OUTSTANDING ACTION ITEMS IN VENDOR AVOIDANCE ACTIONS AND FURTHER DILIGENCE IN CERTAIN CASES	0.50
10/22/20	SAWYER	EMAIL CORRESPONDENCE WITH VENDORS COUNSEL RE OUTSTANDING DILIGENCE ITEMS REQUESTED	0.10
10/22/20	BEVILLE	ANALYZE MEMORANDA REGARDING DEFENSE TO PREFERENCE ACTIONS	0.40
10/22/20	SAWYER	CORRESPONDENCE WITH T. AXELROD AND S. BEVILLE RE RESEARCH AND MEMO AND REVISIONS OF SAME (.3); DRAFT AND SEND SUMMARY EMAIL AND MEMO RE SAME TO SCC AND UCC (.4)	0.70
10/22/20	SAWYER	CORRESPONDENCE WITH FA RE PREPARATION FOR VENDOR STATUS UPDATE WITH UCC ON 10/23	0.10
10/22/20	AXELROD	REVISE MEMO AND RELATED EMAILS TO CLIENT AND UCC	0.30
10/22/20	DEERING	DRAFT PROOF OF CLAIM FOR MAISONET CH 7 CASE (.8) AND EMAILS RE SAME (.2)	1.00
10/22/20	DEERING	DRAFT SUGGESTION OF BANKRUPTCY RE ESTRADA MAISONET (1.0) AND EMAILS RE SAME (.1)	1.10
10/23/20	BEVILLE	REVIEW/REVISE DEFAULT MOTION FOR VENDOR ACTION	0.50
10/23/20	RINNE	WEEKLY STRATEGY MEETING WITH DGC REGARDING STATUS OF DEFAULT VENDORS (.4); REVISE DEFAULT JUDGMENT PAPERS FOR TOLLED PARTY AND COORDINATE DRAFTS OF OTHER DEFAULT DEFENDANT PAPERS (1.0)	1.40
10/23/20	SAWYER	PREPARE FOR MEETING WITH UCC RE VENDOR RECOMMENDATIONS (.4); CALL WITH UCC RE SAME (1.5); FOLLOW-UP CALL WITH FA AND TEAM RE SAME (1.2)	3.10
10/23/20	SAWYER	REVIEW DRAFT LETTER TO VENDOR COUNSEL RE PREFERENCE SETTLEMENT DISCUSSIONS (.2); CORRESPONDENCE WITH T. AXELROD RE RECOMMENDATIONS OF SAME (.2)	0.40
10/23/20	SAWYER	CORRESPONDENCE WITH B. RINNE RE FILING OF MOTION FOR DEFAULT RE VENDOR AVOIDANCE ACTIONS	0.10
10/23/20	SAWYER	REVISIONS TO MOTION FOR DEFAULT JUDGMENT RE VENDOR ACTION	0.30
10/23/20	AXELROD	PREP FOR VENDOR CALL WITH UCC (.3); CALL WITH UCC (1.5); FOLLOWUP WITH DGC (.7)	2.50
10/23/20	SAWYER	DRAFT ADDENDUMS TO TOLLING AGREEMENTS RE VENDOR AVOIDANCE ACTIONS	3.10
10/23/20	DEERING	EMAILS RE TOLLED PARTY PROOF OF CLAIM	0.40



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Date	Professional	Description	Hours
10/24/20	SAWYER	ANALYSIS RE STRATEGY WITH REGARD TO PREFERENCE SETTLEMENT DISCUSSIONS (.1); CORRESPONDENCE WITH B. WEXLER RE LETTER TO DISENGAGED VENDOR (.2)	0.30
10/24/20	SAWYER	DRAFT EXTENSIONS TO TOLLING AGREEMENTS RE VENDOR AVOIDANCE ACTIONS	2.50
10/25/20	RINNE	ANALYZE REVISIONS FROM UCC COUNSEL TO MOTION FOR DEFAULT JUDGMENT REGARDING DEFENDANT TOLLED PARTY (.3); CORRESPOND WITH M. SAWYER REGARDING SAME (.1)	0.40
10/26/20	SAWYER	CORRESPONDENCE WITH TEAM AND FA RE VARIOUS OUTSTANDING ITEMS	0.50
10/26/20	RINNE	CALL WITH AND SEND FOLLOW UP CORRESPONDENCE TO LOCAL COUNSEL REGARDING NEXT STEPS FOR DEFAULT VENDORS (.5); STRATEGIZE WITH M. SAWYER REGARDING TOLLED PARTY DEFAULT JUDGMENT PAPERS AND PREPARE FOR FILING (.3); ANALYZE NEW ENTRIES OF DEFAULT AND UPDATE DEADLINES (.3)	1.10
10/26/20	SAWYER	DRAFT EXTENSIONS TO TOLLING AGREEMENTS RE VENDOR AVOIDANCE ACTIONS	1.90
10/26/20	SAWYER	CALL WITH K. SURIA AND B. RINNE RE OUTSTANDING ACTION ITEMS IN DEFAULT VENDOR CASES	0.40
10/26/20	SAWYER	REVISE LETTER TO PREFERENCE VENDOR COUNSEL	0.30
10/26/20	SAWYER	REVISE DRAFT MOTION FOR DEFAULT JUDGMENT	0.90
10/26/20	SAWYER	CORRESPONDENCE WITH TEAM RE ENTRY OF DEFAULT IN VENDOR ACTIONS AND COORDINATION OF NEXT STEPS (.3); CORRESPONDENCE WITH TEAM RE MOTION FOR ENTRY OF DEFAULT (.1)	0.40
10/26/20	AXELROD	EMAILS RE PREFERENCE NEGOTIATION STATUS	0.20
10/26/20	DEERING	EMAILS RE PROOF OF SERVICE OF DEFAULT IN ADV. PRO. 19-00227 (.3) AND REVIEW OF SAME (.2)	0.50
10/26/20	SAWYER	CORRESPONDENCE WITH TEAM RE OUTSTANDING ACTION ITEMS RE VENDOR AVOIDANCE ACTIONS	0.30
10/26/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	1.90
10/27/20	RINNE	REVIEWING AND FINALIZING MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANT WF COMPUTER SERVICES	0.70
10/27/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	6.80
10/27/20	SAWYER	CALL WITH C. INFANTE RE NEXT STEPS IN VENDOR AVOIDANCE ACTIONS	0.20
10/27/20	AXELROD	ANALYSIS RE OPEN ITEMS IN VENDOR ACTIONS	0.20
10/27/20	SAWYER	STRATEGIZE RE UPCOMING ACTION ITEMS RE VENDOR AVOIDANCE ACTIONS	0.20



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Date	Professional	Description	Hours
10/27/20	DEERING	REVIEW AND CITE CHECK MOTION FOR DEFAULT OF TOLLED PARTY (1.2) AND EMAILS RE SAME (.2)	1.40
10/27/20	SAWYER	REVIEW AND REVISE DEFAULT MOTION PAPERS AND CIRCULATE TO B. RINNE FOR REVIEW	0.90
10/27/20	SAWYER	DRAFT MOTION TO EXTEND LITIGATION DEADLINES RE VENDOR AVOIDANCE ACTIONS	1.00
10/28/20	SAWYER	FINALIZE DEFAULT MOTION PAPERS FOR FILING	0.50
10/28/20	RINNE	FINALIZING AND COORDINATING FILING OF MOTION FOR DEFAULT JUDGMENT AGAINST TOLLED PARTY	0.60
10/28/20	SAWYER	CONTINUE DRAFT EXTENSION MOTION RE VENDOR AVOIDANCE ACTIONS	1.90
10/28/20	SAWYER	REVIEW MTD FILED IN AP RE VENDOR AVOIDANCE ACTION AND OUTLINE RESPONSE TO SAME	2.60
10/28/20	SAWYER	CORRESPONDENCE WITH VENDOR'S COUNSEL AND T. AXELROD RE STATUS UPDATE OF INFORMATION EXCHANGE AND NEXT STEPS (.2); CORRESPONDENCE WITH FA RE SAME (.1)	0.30
10/28/20	AXELROD	REVIEW AND RESPOND TO EMAILS RE VENDOR SETTLEMENT CALL SCHEDULING, RELATED PREFERENCE ISSUES	0.40
10/28/20	DEERING	REVIEW MOTION FOR DEFAULT, MEMO, SUPPORTING AFFIDAVITS AND EXHIBITS FOR WF COMPUTER (.8), FILE SAME (.5), COORDINATE SERVICE OF SAME (.2), AND EMAILS WITH B. RINNE AND M. SAWYER RE SAME (.3)	1.80
10/28/20	SAWYER	REVISE MOTION FOR DEFAULT JUDGMENT	1.10
10/29/20	RINNE	WEEKLY STRATEGY MEETING WITH DGC REGARDING STATUS OF DEFAULT DEFENDANTS (.3); CORRESPOND WITH M. SAWYER REGARDING SAME (.1)	0.40
10/29/20	SAWYER	REVIEW NEW VALUE DEFENSE LETTER TO VENDOR AND EMAIL CORRESPONDENCE WITH FA RE SAME	0.30
10/29/20	SAWYER	REVISE MOTION FOR DEFAULT JUDGMENT AND CIRCULATE SAME TO B. RINNE FOR REVIEW AND COMMENT	1.10
10/29/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	1.40
10/29/20	SAWYER	PREPARE FOR MEETING WITH TEAM AND FA (.4); MEETING WITH SAME RE OUTSTANDING ACTION ITEMS IN VENDOR AVOIDANCE ACTIONS (.8)	1.20
10/29/20	SAWYER	DRAFT LANGUAGE TO BE INCLUDED IN RECOMMENDATION MEMOS	0.50
10/29/20	SAWYER	REVIEW AND REVISE MOTION FOR ENTRY OF DEFAULT RE VENDOR AVOIDANCE ACTION	0.70
10/29/20	AXELROD	PREP (.1) AND MEETING WITH DGC RE OUTSTANDING VENDOR ISSUES (.9); REVISE MEMO PARAGRAPH RE EXHIBIT 1 DATA DISCREPANCIES (.4); REVIEW MOTION FOR DEFAULT ENTRY (.1)	1.50





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Date	Professional	Description	Hours
10/29/20	SAWYER	EMAIL CORRESPONDENCE WITH FA RE PREFERENCE DEFENSE TOLLED PARTY	0.30
10/29/20	SAWYER	CORRESPONDENCE WITH FA, UCC COUNSEL, AND TEAM RE VENDOR RECOMMENDATION FOLLOW-UP	0.20
10/29/20	SAWYER	CALL WITH B. WEXLER RE PREFERENCE ACTIONS STATUS UPDATE AND DEFENSE STRATEGY	0.30
10/30/20	SAWYER	PREPARE RECOMMENDATION MEMOS TO BE SENT TO THE SCC (.6); SEND SAME TO SCC FOR REVIEW (.1)	0.70
10/30/20	SAWYER	CORRESPONDENCE WITH FA RE STATUS OF FUEL OIL DEFENDANTS AND DRAFT NOTE TO UNRESPONSIVE DEFENDANTS	0.20
10/30/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.60
10/30/20	SAWYER	CORRESPONDENCE WITH LOCAL COUNSEL RE MOTION REQUESTING ENTRY OF DEFAULT	0.20
10/30/20	SAWYER	DRAFT LETTER TO DISENGAGED VENDORS RE INFORMATION EXCHANGE IN VENDOR AVOIDANCE ACTIONS	1.20
10/30/20	SAWYER	REVIEW PREFERENCE VENDOR'S DEFENSE TO LIABILITY	2.00
10/31/20	SAWYER	PREPARE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	1.60
<b>Total Hours</b>			<b>202.80</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
SUNNI P. BEVILLE	4.40 hours at	790.00	3,476.00
BLAIR M. RINNE	35.80 hours at	790.00	28,282.00
TRISTAN G. AXELROD	25.20 hours at	790.00	19,908.00
ALEXANDRA M. DEERING	8.40 hours at	270.00	2,268.00
MATTHEW A. SAWYER	129.00 hours at	790.00	101,910.00
<b>Total Fees</b>			<b>155,844.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175



**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6908235  
Date Nov 19, 2020  
Client 035179

RE: PLAN AND DISCLOSURE STATEMENT

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through October 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0019	PLAN AND DISCLOSURE STATEMENT	2,765.00	0.00	2,765.00
<b>Total</b>		<b>2,765.00</b>	<b>0.00</b>	<b>2,765.00</b>

Total Current Fees \$2,765.00

Total Current Costs \$0.00

**Total Invoice \$2,765.00**



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RE: PLAN AND DISCLOSURE STATEMENT

TIME DETAIL

Date	Professional	Description	Hours
10/01/20	AXELROD	REVIEW FORM B STATUS REPORT	0.30
10/28/20	AXELROD	ATTEND OMNIBUS HEARING RE PLAN TIMING AND MEDIATION PROGRESS ISSUES	3.20
Total Hours			3.50

TIME SUMMARY

Professional	Hours	Rate	Value
TRISTAN G. AXELROD	3.50 hours at	790.00	2,765.00
Total Fees			2,765.00

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6908235
Date	Nov 19, 2020
Client	035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

**Remittance** 

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**Balance Due: \$166,048.00**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**


Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**PRINCIPAL CERTIFICATION**

I hereby authorize the submission of this Twenty-Third Monthly Fee Statement for Brown Rudnick LLP covering the period from October 1, 2020 through October 31, 2020.



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Jaime A. El Koury  
General Counsel to the Financial Oversight  
and Management Board for Puerto Rico

**EXHIBIT G-2**

**TWENTY-FOURTH MONTHLY FEE STATEMENT  
(NOVEMBER 1, 2020 THROUGH NOVEMBER 30, 2020)**

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III  
Case No. 17-BK-3283 (LTS)

(Jointly Administered)

**TWENTY-FOURTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP,  
CLAIMS COUNSEL FOR THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
FOR SERVICES AND DISBURSEMENTS FOR THE PERIOD OF  
NOVEMBER 1, 2020 THROUGH NOVEMBER 30, 2020**

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Commonwealth of Puerto Rico, *et al.*

December 22, 2020

FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

Client Ref. No. 35179

Invoice Nos. 6909801 and 6909802

Re: The Financial Oversight and Management Board for Puerto Rico,  
as representative of The Commonwealth of Puerto Rico, *et al.*  
Debtors under Title III  
November 1, 2020 – November 30, 2020

Professional services rendered by Brown Rudnick LLP,  
Claims Counsel for The Financial Oversight and Management Board for Puerto Rico, acting  
through its Special Claims Committee

**Total Amount of Compensation for Professional Services** **\$180,846.00**

Less Holdback as per Court Order dated June 6, 2018 [Docket No. 3269] (10%)	\$18,084.60
Interim Compensation for Professional Services (90%)	\$162,761.40
Plus Reimbursement for Actual and Necessary Expenses	\$1,357.00
Total Requested Payment Less Holdback <sup>2</sup>	<b>\$164,118.40</b>

<sup>2</sup> Brown Rudnick LLP reserves the right to include a gross-up amount in its interim fee application relating to any professional fee tax that is imposed on Brown Rudnick LLP. Brown Rudnick will endeavor to make any such gross-up consistent with the discussion reflected at the hearing conducted by Judge Swain on December 19, 2018 addressing the fee examiner's proposed additional presumptive standards and with any recommendation made by the fee examiner and as may be approved by the Court.

**FEE STATEMENT INDEX**

<b>Exhibit A</b>	<b>Summary of Fees and Costs by Task Code</b>
<b>Exhibit B</b>	<b>Summary of Hours and Fees by Professional</b>
<b>Exhibit C</b>	<b>Summary of Costs</b>
<b>Exhibit D</b>	<b>Time Entries for Each Professional by Task Code (Invoices)</b>



**EXHIBIT A**

<b><u>Task Code</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>	<b><u>Costs</u></b>	<b><u>Total Amount</u></b>
General /Costs Only	0.0	\$0.00	\$1,357.00	\$1,357.00
Meetings and Communications with Client	1.2	\$948.00	\$0.00	\$948.00
Fee Applications	14.3	\$3,861.00	\$0.00	\$3,861.00
Avoidance Actions	227.9	\$176,037.00	\$0.00	\$176,037.00
<b>TOTAL</b>	<b>243.4</b>	<b>\$180,846.00</b>	<b>\$1,357.00</b>	<b>\$182,203.00</b>

**EXHIBIT B**

**SERVICES RENDERED BY  
BROWN RUDNICK LLP**

**COMMENCING NOVEMBER 1, 2020 THROUGH NOVEMBER 30, 2020**

**TIME AND COMPENSATION BREAKDOWN**

<b>Partners and Of Counsel</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Sunni P. Beville	Partner; Admitted to Massachusetts Bar in 2002; Restructuring	\$790.00	6.8	\$5,372.00
Edward S. Weisfelner	Partner, Admitted to New York Bar in 1983; Restructuring	\$790.00	.6	\$474.00
<b>TOTAL</b>			<b>7.4</b>	<b>\$5,846.00</b>

<b>Associates</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Tristan G. Axelrod	Associate; Admitted to Massachusetts Bar in 2014; Restructuring	\$790.00	58.0	\$45,820.00
Blair Rinne	Associate; Admitted to Massachusetts Bar in 2014; Litigation	\$790.00	11.3	\$8,927.00
Matthew Sawyer	Associate; Admitted to Massachusetts Bar in 2019; Restructuring	\$790.00	144.7	\$114,313.00
<b>TOTAL</b>			<b>214.0</b>	<b>\$169,060.00</b>

<b>Paralegals and Other Professionals</b>	<b>Position; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Harriet E. Cohen	N/A; Paralegal with over 30 years' experience; Restructuring	\$270.00	14.3	\$3,861.00
Alexandra M. Deering	N/A; Paralegal with over 5 years' experience; Restructuring	\$270.00	7.7	\$2,079.00
<b>TOTAL</b>			<b>22.0</b>	<b>\$5,940.00</b>
<b>GRAND TOTAL</b>			<b>243.4</b>	<b>\$180,846.00</b>

**EXHIBIT C**

**ACTUAL AND NECESSARY COSTS INCURRED BY  
BROWN RUDNICK LLP COMMENCING  
NOVEMBER 1, 2020 THROUGH NOVEMBER 30, 2020**

<u>Service</u>	<u>Cost</u>
Copies (B&W @ 10 cents per page)	\$7.90
Pacer	\$253.10
Overnight Delivery	\$30.00
Westlaw	\$1,066.00
<b>TOTAL</b>	<b>\$1,357.00</b>

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PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6909801  
Date Dec 14, 2020  
Client 035179

RE: COSTS

INVOICE

For professional services rendered in connection with the above captioned matter  
through November 30, 2020:

Matter No.	Matter Name	Fees	Costs	Total
035179.0001	COSTS	0.00	1,357.00	1,357.00
Total		0.00	1,357.00	1,357.00

Total Current Fees	\$0.00
Total Current Costs	\$1,357.00
<b>Total Invoice</b>	<b>\$1,357.00</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
 RE: COSTS  
 December 14, 2020

Invoice 6909801  
 Page 2

**COST DETAIL**

Date	Description	Value
11/01/20	PACER	15.20
11/01/20	PACER	56.60
11/01/20	PACER	24.30
11/01/20	PACER	54.80
11/01/20	PACER	6.60
11/01/20	PACER	1.50
11/01/20	PACER	7.40
11/01/20	PACER	63.40
11/01/20	PACER	12.30
11/01/20	PACER	8.90
11/01/20	PACER	2.10
11/03/20	COPIES	0.20
11/03/20	COPIES	2.40
11/03/20	COPIES	0.40
11/03/20	COPIES	0.10
11/03/20	COPIES	0.10
11/03/20	COPIES	0.10
11/09/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	10.00
11/09/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
11/09/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	85.00
11/10/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
11/11/20	COPIES	0.30
11/11/20	COPIES	2.00
11/11/20	COPIES	0.10
11/11/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	4.00
11/11/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	90.00
11/11/20	OVERNIGHT DELIVERY	30.00
11/12/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	6.00
11/12/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	120.00
11/12/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	198.00
11/13/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	49.00
11/14/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	64.00
11/16/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
11/16/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	50.00



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
RE: COSTS  
December 14, 2020

Invoice 6909801

Page 3

Date	Description	Value
11/17/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
11/17/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	70.00
11/17/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	60.00
11/18/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
11/18/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	25.00
11/18/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	4.00
11/18/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	35.00
11/19/20	COPIES	0.90
11/19/20	COPIES	0.30
11/19/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	4.00
11/19/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	79.00
11/19/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	45.00
11/23/20	COPIES	0.20
11/23/20	COPIES	0.20
11/23/20	COPIES	0.20
11/23/20	COPIES	0.20
11/23/20	COPIES	0.20
11/23/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	35.00
11/24/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
11/25/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
11/25/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	10.00
<b>Total Costs</b>		<b>1,357.00</b>

## COST SUMMARY

Description	Value
OVERNIGHT DELIVERY	30.00
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	1,066.00
PACER	253.10
COPIES	7.90
<b>Total Costs</b>	<b>1,357.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175



**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6909801  
Date Dec 14, 2020  
Client 035179

RE: COSTS

**Remittance** 

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**Balance Due: \$1,357.00**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**EXHIBIT D**

**Time Entries for Each Professional By Task Code (Invoice)**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6909802  
Date Dec 14, 2020  
Client 035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

## INVOICE

For professional services rendered in connection with the above captioned matter  
through November 30, 2020:

Matter No.	Matter Name	Fees	Costs	Total
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	948.00	0.00	948.00
035179.0004	FEE APPLICATIONS	3,861.00	0.00	3,861.00
035179.0015	AVOIDANCE ACTIONS	176,037.00	0.00	176,037.00
<b>Total</b>		<b>180,846.00</b>	<b>0.00</b>	<b>180,846.00</b>

Total Current Fees	\$180,846.00
Total Current Costs	\$0.00
<b>Total Invoice</b>	<b>\$180,846.00</b>

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6909802  
Date Dec 14, 2020  
Client 035179

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through November 30, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	948.00	0.00	948.00
<b>Total</b>		<b>948.00</b>	<b>0.00</b>	<b>948.00</b>

Total Current Fees \$948.00

Total Current Costs \$0.00

**Total Invoice \$948.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
December 14, 2020  
Invoice 6909802  
Page 3

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

TIME DETAIL

Date	Professional	Description	Hours
11/03/20	BEVILLE	CORRESPONDENCE REGARDING CLIENT UPDATE	0.20
11/03/20	WEISFELNER	COMMUNICATE WITH S.BEVILLE AND T. AXLEROD RE 11/4 SCC MEETING	0.30
11/09/20	BEVILLE	CORRESPONDENCE REGARDING AGENDA FOR CALL	0.30
11/16/20	WEISFELNER	ATTENTION TO SCHEDULE AND SCC CANCELLATION	0.30
11/23/20	BEVILLE	CORRESPONDENCE REGARDING CLIENT CALL	0.10
Total Hours			1.20

TIME SUMMARY

Professional	Hours	Rate	Value
SUNNI P. BEVILLE	0.60 hours at	790.00	474.00
EDWARD S. WEISFELNER	0.60 hours at	790.00	474.00
Total Fees			948.00

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6909802  
Date Dec 14, 2020  
Client 035179

RE: FEE APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through November 30, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0004	FEE APPLICATIONS	3,861.00	0.00	3,861.00
<b>Total</b>		<b>3,861.00</b>	<b>0.00</b>	<b>3,861.00</b>

Total Current Fees \$3,861.00

Total Current Costs \$0.00

**Total Invoice \$3,861.00**



RE: FEE APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours
11/03/20	COHEN	STRATEGIZE REGARDING INTERIM FEE APPLICATIONS AND MONTHLY FEE STATEMENTS, EMAILS WITH V. BLAY SOLER	0.40
11/04/20	COHEN	EMAILS WITH C. BURKE; STATUS EMAIL TO S. BEVILLE; STRATEGIZE REGARDING MONTHLY FEE STATEMENTS	0.40
11/05/20	COHEN	WORK ON MONTHLY FEE STATEMENTS (.6); SEND DOCUMENTS TO DGC AS REQUESTED (.2); ADMINISTRATIVE AND ORGANIZATIONAL ISSUES (.4)	1.20
11/06/20	COHEN	WORK ON MONTHLY FEE STATEMENTS, FINALIZE AND SEND TO J. EL KOURY FOR PRINCIPAL CERTIFICATION AND SUBMIT ACCORDINGLY (1.3); STRATEGIZE REGARDING STATUS (.3)	1.60
11/09/20	COHEN	PREPARE AND SUBMIT CARDONA OCTOBER FEE STATEMENTS (.3); SUBMIT DGC TITLE III NO OBJECTION STATEMENTS (.3); REVIEW AND SEND DGC SEPTEMBER FEE STATEMENTS TO J. EL KOURY FOR PRINCIPAL CERTIFICATION (.2); STRATEGIZE REGARDING FEE STATEMENTS AND INTERIM APPLICATIONS (.3)	1.10
11/10/20	COHEN	FINALIZE AND SUBMIT CARDONA OCTOBER STATEMENTS (.4); FINALIZE AND SUBMIT DGC SEPTEMBER MONTHLY STATEMENTS (.4); WORK ON BROWN RUDNICK OCTOBER MONTHLY FEE STATEMENTS (.6)	1.40
11/11/20	COHEN	WORK ON DRAFT MONTHLY FEE STATEMENTS AND NO OBJECTION STATEMENTS (.5); COMPILATION OF DOCUMENTS AND EXHIBITS FOR FEE APPLICATION FILINGS (.3)	0.80
11/12/20	COHEN	EMAILS WITH C. BURKE (.2); STRATEGIZE REGARDING STATUS AND TIMELINE (.2)	0.40
11/13/20	COHEN	EMAILS WITH S. BEVILLE, STRATEGIZE REGARDING STATUS AND TIMELINE FOR FEE APPLICATIONS AND MONTHLY STATEMENTS	0.40
11/16/20	COHEN	EMAILS WITH S. BEVILLE, C. BURKE AND I. CARDONA AND STRATEGIZE REGARDING STATUS OF FEE APPLICATIONS (.5); PREPARE NOTICES AND EXHIBITS AS APPROPRIATE (.7)	1.20
11/18/20	COHEN	MAILS WITH I. CARDONA, V. BLAY SOLER AND S. BEVILLE REGARDING STATUS AND VARIOUS MATTERS (.4); DRAFT AND PREPARE SUBMISSION OF TITLE III DECLARATIONS FOR BROWN RUDNICK SEPTEMBER FEE STATEMENTS (.6)	1.00



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
December 14, 2020  
Invoice 6909802  
Page 6

Date	Professional	Description	Hours
11/19/20	COHEN	WORK ON BROWN RUDNICK OCTOBER FEE STATEMENTS (.9); COMMUNICATE WITH I. CARDONA REGARDING INTERIM FEE APPLICATION, REVISE, FINALIZE AND ASSEMBLE SAME (.7); EFFECTUATE FILING AND EMAILS WITH PRIME CLERK TO ARRANGE FOR SERVICE (.5)	2.10
11/20/20	COHEN	FINALIZE BROWN RUDNICK OCTOBER FEE STATEMENTS, SEND TO J. EL KOURY AND SUBMIT ACCORDINGLY (.9); PREPARE SUBMISSION OF CARDONA TITLE III DECLARATIONS FOR OCTOBER (.4); STATUS UPDATES AND EMAILS TO S. BEVILLE (.2)	1.50
11/30/20	COHEN	EMAILS AND STRATEGIZE REGARDING STATUS (.3); SUBMIT DGC NO OBJECTION STATEMENTS FOR SEPTEMBER (.3); WORK ON DRAFT NO OBJECTION STATEMENTS FOR BROWN RUDNICK (.2)	0.80
<b>Total Hours</b>			<b>14.30</b>

TIME SUMMARY

Professional	Hours	Rate	Value
HARRIET E. COHEN	14.30 hours at	270.00	3,861.00
<b>Total Fees</b>			<b>3,861.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175



**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6909802  
Date Dec 14, 2020  
Client 035179

RE: AVOIDANCE ACTIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through November 30, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0015	AVOIDANCE ACTIONS	176,037.00	0.00	176,037.00
<b>Total</b>		<b>176,037.00</b>	<b>0.00</b>	<b>176,037.00</b>

Total Current Fees \$176,037.00

Total Current Costs \$0.00

**Total Invoice \$176,037.00**



RE: AVOIDANCE ACTIONS

TIME DETAIL

Date	Professional	Description	Hours
11/01/20	SAWYER	PREPARE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND SEND SAME TO T. AXELROD FOR REVIEW	1.00
11/01/20	SAWYER	FURTHER REVISE EXTENSION MOTION AND SEND TO T. AXELROD FOR REVIEW AND COMMENT	0.70
11/02/20	SAWYER	DRAFT LETTER TO VENDOR RE ENGAGEMENT IN INFORMATION EXCHANGE PROCESS	0.60
11/02/20	SAWYER	REVISE EXTENSION MOTION AND PROPOSED ORDER RE VENDOR AVOIDANCE ACTIONS	0.70
11/02/20	SAWYER	CORRESPONDENCE WITH T. AXELROD RE REVISIONS TO RECOMMENDATION MEMOS (.6); REVISE SAME (1.5); SEND TO S. BEVILLE FOR REVIEW (.1)	2.20
11/02/20	SAWYER	PREPARE FOR MEETING WITH E. DA SILVA AND T. DONAHOE RE OUTSTANDING ITEMS IN VENDOR AVOIDANCE ACTIONS AND CLARIFICATION OF DILIGENCE RE SAME (.4); MEETING RE SAME (1.5)	1.90
11/02/20	AXELROD	REVIEW AND REVISE AND EMAILS RE VENDOR RECOMMENDATIONS	1.50
11/02/20	SAWYER	CORRESPONDENCE WITH VENDOR'S COUNSEL RE PREFERENCE DEFENSES (.2); CORRESPONDENCE WITH T. AXELROD RE SAME (.2)	0.40
11/02/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	2.10
11/03/20	RINNE	CORRESPOND WITH M. SAWYER REGARDING STATUS OF OPPOSITION REGARDING TOLLED PARTY	0.10
11/03/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.60
11/03/20	AXELROD	DRAFT AND SEND LETTERS TO VENDORS	1.20
11/03/20	SAWYER	PREPARE RECOMMENDATION MEMOS FOR UCC REVIEW RE VENDOR AVOIDANCE ACTIONS (.4); DRAFT SAME (3.5)	3.90
11/04/20	RINNE	CORRESPOND WITH DGC REGARDING TOLLED PARTY	0.10
11/05/20	BEVILLE	ANALYSIS REGARDING VENDOR ACTION / PREFERENCE RECOMMENDATIONS (.3); STRATEGIZE REGARDING EVERTEC RESPONSE (.2); STRATEGIZE TOLLED PARTY (.3); ANALYSIS REGARDING NEED FOR FURTHER LITIGATION EXTENSION (.2)	1.00
11/05/20	RINNE	STRATEGY MEETING WITH DGC (.3); ANALYZE UPDATE FROM K. SURIA REGARDING STATUS OF DEFAULT VENDOR ISSUES (.2)	0.50
11/05/20	SAWYER	DRAFT PREFERENCE SETTLEMENT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	3.00



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11/05/20	SAWYER	MEETING WITH DGC AND TEAM RE OUTSTANDING ISSUES IN THE VENDOR AVOIDANCE ACTIONS AND NEXT STEPS	0.70
11/05/20	SAWYER	CORRESPONDENCE WITH DGC RE VENDOR DILIGENCE QUESTIONS IN RECOMMENDATION MEMOS	0.60
11/05/20	AXELROD	CALLS AND EMAILS WITH VENDOR COUNSELS AND WORKING GROUP RE SETTLEMENT STATUS (.8); MEETING WITH WORKING GROUP RE VENDOR CASES (.9)	1.70
11/05/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS (2.4); EMAIL SAME TO SCC FOR REVIEW AND APPROVAL (.2)	2.60
11/05/20	DEERING	REVIEW DOCKET AND UPDATE CASE CALENDAR RE MOTIONS FOR DEFAULT JUDGMENT DEADLINES	0.60
11/06/20	BEVILLE	ANALYSIS REGARDING OPEN ISSUES RELATING TO VENDOR ACTIONS	0.50
11/06/20	SAWYER	CALL WITH T. AXELROD RE PREFERENCE VENDOR MEMOS, MOTION TO DISMISS RESPONSE, AND EXTENSION MOTION RE VENDOR AVOIDANCE ACTIONS	0.30
11/06/20	SAWYER	CALL WITH B. WEXLER RE REVISIONS TO PREFERENCE VENDOR MEMOS AND DILIGENCE STATUS ON VENDOR RE VENDOR AVOIDANCE ACTIONS	0.40
11/06/20	AXELROD	DRAFT SUMMARY OF SCC ACTIVITY (.5); REVIEW AND DISCUSS RECOMMENDATION MEMOS RE PREFERENCE ACTIONS (.8); CALL WITH COUNSEL (.2)	1.50
11/06/20	SAWYER	REVISE DRAFT PREFERENCE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.40
11/06/20	SAWYER	DRAFT LETTER TO NON-ENGAGED VENDOR RE INFORMATION EXCHANGE	0.30
11/06/20	SAWYER	REVIEW MEMO RE DEFENSE TO PREFERENCE LIABILITY (.5); CALL WITH C. INFANTE RE SAME (.2)	0.70
11/06/20	SAWYER	EMAIL CORRESPONDENCE WITH FA RE OUTSTANDING ITEMS IN VENDOR AVOIDANCE ACTIONS	0.40
11/06/20	SAWYER	FINALIZE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	1.10
11/07/20	SAWYER	CONTINUE DRAFT OF RULE 2019 STATEMENT	2.60
11/08/20	SAWYER	DRAFT RESPONSE TO MOTION TO DISMISS RE VENDOR AVOIDANCE ACTION	1.20
11/09/20	RINNE	ANALYZE FURTHER STANDING ORDER REGARDING DEFAULT JUDGMENT CASES AND CHECKING STATUS OF DEFAULT DEFENDANT DOCKETS (.5); STRATEGIZE REGARDING NEXT STEPS AS TO SAME (.3)	0.80



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11/09/20	SAWYER	RESEARCH RE MOTION TO DISMISS RESPONSE RE VENDOR AVOIDANCE ACTION	4.20
11/09/20	SAWYER	CALL WITH TEAM AND UCC COUNSELS RE RECOMMENDATIONS IN VENDOR AVOIDANCE ACTIONS (1.6); STRETEGIZE WITH T. AXELROD AND FOLLOW-UP RE SAME (.2)	1.80
11/09/20	SAWYER	ANALYZE LETTER FROM VENDOR RE FRAUDULENT TRANSFER CLAIM DEFENSES	0.40
11/09/20	AXELROD	REVIEW AND REVISE RECOMMENDATION MEMOS RE VENDOR ACTIONS (1.5); CALL WITH UCC RE SAME (1.8); REVIEW AND COMMENT RE ELECTION YEAR PREF DEFENSE RESEARCH (.7); REVIEW COURT ORDER RE DEFAULT CASES (.4); REVIEW LETTER RE FRAUDULENT TRANSFER DEFENSES AND STRATEGIZE RE RESPONSE (1.0)	5.40
11/09/20	SAWYER	FACILITATE EXECUTION OF TOLLING AGREEMENT EXTENSIONS RE VENDOR AVOIDANCE ACTIONS	1.90
11/10/20	RINNE	ANALYZE REVISED MOTION TO INFORM COMPLIANCE REGARDING COURT'S STANDING ORDER (.3); ANALYSIS REGARDING ADDITIONAL PLEADINGS NEEDED FOR DEFAULT DEFENDANT FILINGS (.2); CORRESPOND REGARDING SAME (.2)	0.70
11/10/20	SAWYER	FACILITATE EXECUTION OF TOLLING AGREEMENTS RE VENDOR AVOIDANCE ACTIONS	2.70
11/10/20	SAWYER	DRAFT RESPONSE TO MOTION TO DISMISS RE VENDOR ACTION	1.90
11/10/20	SAWYER	CALLS WITH T. AXELROD AND DGC RE RECOMMENDATION MEMO REVISIONS AND PAYMENT DISCREPANCY ISSUES	1.30
11/10/20	SAWYER	PREPARE FOR CALL WITH TEAM AND VENDOR'S COUNSEL RE PREFERENCE SETTLEMENT DISCUSSIONS (.5); CALL RE SAME (.7); FOLLOW UP REGARDING NEXT STEPS (.1)	1.30
11/10/20	SAWYER	REVISE PREFERENCE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND SEND TO UCC COUNSEL FOR REVIEW AND APPROVAL	1.00
11/10/20	AXELROD	REVIEW PREFERENCE ISSUE CORRESPONDENCE AND PREPARE FOR DGC MEETING (.5); REVIEW DOCKET AND CASE UPDATES (.5); MEETING WITH DGC RE VENDOR RESEARCH ISSUES (1.3); CALL WITH COUNSEL TO VENDOR (.4); RESEARCH RE DOE FUNDS PREFERENCE DEFENSE (1.9)	4.60
11/10/20	DEERING	EMAILS RE PROOF OF CLAIM FOR MAISONET CH 7 CASE (.4); REVISIONS TO PROOF OF CLAIM RE SAME (.4)	0.80



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11/11/20	RINNE	ANALYZE ADDITIONAL MOTIONS TO INFORM COMPLIANCE OF STANDING ORDER FOR DEFAULT DEFENDANTS (.3); CORRESPOND WITH LOCAL COUNSEL REGARDING SAME (.2); COORDINATE COMPILATION OF ADDITIONAL EXHIBITS FOR DEFAULT JUDGMENT MOTIONS (.2)	0.70
11/11/20	SAWYER	CONTINUE DRAFT OF RESPONSE TO VENDOR'S MOTION TO DISMISS RE VENDOR AVOIDANCE ACTION	7.70
11/11/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS RE VENDOR ACTIONS	1.10
11/11/20	SAWYER	MEETING WITH FA RE OUTSTANDING ITEMS IN VENDOR ACTIONS	0.40
11/11/20	DEERING	COORDINATE FILING OF PROOF OF CLAIMS IN MAISONET CH 7 CASE	0.30
11/11/20	AXELROD	REVIEW NOTES RE TOLLED VENDOR AND PREP FOR CALL (.2); CALL WITH BOARD GC RE TOLLED VENDOR (.4); FOLLOWUP DRAFT MESSAGE RE SAME (.2); CALL WITH PEARSON RE PREFERENCE SETTLEMENT (.3); DRAFT NOTE TO UCC RE SAME (.4); DRAFT NOTE TO CLC COUNSEL RE FEDERAL FUNDS ISSUES (.3)	1.80
11/11/20	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND SEND SAME TO T. AXELROD FOR REVIEW	1.20
11/12/20	SAWYER	CONTINUE DRAFT AND RESEARCH RE RESPONSE TO MOTION TO DISMISS IN VENDOR ACTION	6.80
11/12/20	SAWYER	CORRESPONDENCE WITH DGC RE PREFERENCE DEFENSE DILIGENCE ITEMS	0.20
11/12/20	SAWYER	MEETING WITH TEAM AND DGC RE OUTSTANDING VENDOR ITEMS (.5); REVISE RECOMMENDATION MEMOS AND SEND SAME TO DGC (.5); COORDINATE MEETING WITH TEAM DGC AND VENDOR RE INFORMATION EXCHANGE (.2)	1.20
11/12/20	SAWYER	FACILITATE EXECUTION OF EXTENSION TO NDAS RE VENDOR ACTIONS	0.30
11/12/20	SAWYER	CALL WITH C. INFANTE RE OUTSTANDING ITEMS IN VENDOR AVOIDANCE ACTIONS	0.40
11/12/20	AXELROD	REVIEW AND RESPOND TO EMAILS RE VENDOR SETTLEMENT ISSUES (.4); CALL WITH DGC AND TEAM RE VENDOR PROGRESS (.5)	0.90
11/12/20	RINNE	WEEKLY MEETING WITH DGC REGARDING STATUS OF DEFAULT DEFENDANT ACTIONS AND PREPARE FOR SAME (.5); ANALYZE ISSUES WITH FILINGS WITH RESPECT TO DEFAULT DEFENDANTS (.5)	1.00
11/13/20	BEVILLE	CORRESPONDENCE REGARDING POTENTIAL PARTIAL RESOLUTION OF EVERTEC CLAIM	0.30
11/13/20	RINNE	STRATEGIZE WITH M. SAWYER REGARDING COMPTROLLER CERTIFICATES FOR DEFAULT DEFENDANTS	0.20



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11/13/20	SAWYER	DRAFT PREFERENCE RECOMMENDATION MEMOS RE VENDOR ACTIONS	0.70
11/13/20	SAWYER	CONTINUE DRAFT AND REVISIONS TO RESPONSE TO MOTION TO DISMISS	2.70
11/13/20	SAWYER	CALL WITH DGC RE CONTRACT COVERAGE FOR VENDOR IN VENDOR ACTIONS (.2); CALL WITH T. AXELROD RE SAME (.1); DRAFT RECOMMENDATION MEMO RE SAME (1.2)	1.50
11/13/20	SAWYER	REVIEW AND REVISE LETTER RESPONSE TO LETTER FROM VENDOR'S COUNSEL RE AVOIDANCE ACTIONS	0.60
11/13/20	SAWYER	FACILITATE EXECUTION OF EXTENSION TO TOLLING AGREEMENTS	0.20
11/13/20	SAWYER	REVISE MOTION TO EXTEND LITIGATION DEADLINES RE VENDOR AVOIDANCE ACTIONS (.5); SEND SAME TO LOCAL COUNSEL AND UCC COUNSEL FOR REVIEW AND COMMENT (.1)	0.60
11/13/20	AXELROD	REVIEW AND RESPOND TO UCC EMAILS RE PEARSON (.8); CALL RE SAME (.2); FOLLOW UP AND EMAILS RE PREFERENCE RECOMMENDATIONS (.3); REVISE AND CIRCULATE MEMO AND NOTES RE EVERTEC (1.0)	2.30
11/14/20	SAWYER	REVISE DRAFT RESPONSE TO MOTION TO DISMISS RE VENDOR AVOIDANCE ACTIONS (2.8); SEND TO T. AXELROD FOR REVIEW AND COMMENT (.1)	2.90
11/15/20	SAWYER	EMAIL CORRESPONDENCE WITH DGC AND T. AXELROD RE PREFERENCE DEFENSES IN VENDOR AVOIDANCE ACTIONS	0.50
11/15/20	SAWYER	DRAFT PREFERENCE RECOMMENDATION RE VENDOR AVOIDANCE ACTIONS (1.1); CALL WITH B. WEXLER RE SAME (.4)	1.50
11/16/20	SAWYER	REVIEW PREFERENCE CLAIM BACKUP MATERIAL FROM DGC	0.50
11/16/20	SAWYER	CALL WITH T. AXELROD RE AGENDA FOR CALL WITH UCC AND VENDOR ACTION ITEMS	0.20
11/16/20	RINNE	ANALYZE COMPTROLLER CERTIFICATIONS FOR ADDITIONAL AVOIDANCE ACTION DEFENDANTS (.7); CORRESPOND WITH DGC AND LOCAL COUNSEL REGARDING SAME (.3); IDENTIFY NEEDED EXHIBITS FOR MOTIONS FOR DEFAULT JUDGMENT (.6)	1.60
11/16/20	SAWYER	FACILITATE EXECUTION OF TOLLING AGREEMENTS	0.60
11/16/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.70
11/16/20	SAWYER	REVISE PREFERENCE RECOMMENDATION MEMO AND SEND SAME TO UCC FOR REVIEW AND COMMENT	1.40
11/16/20	SAWYER	PREPARE AGENDA AND MATERIALS FOR CALL WITH UCC RE VENDOR AVOIDANCE ACTIONS (.6); CALL RE SAME (.7); FOLLOW-UP REGARDING SAME (.2)	1.50



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11/16/20	AXELROD	CALLS AND EMAILS RE EVERTEC AND RELATED ITEMS (1.3); CALL WITH EVERTEC COUNSEL AND FOLLOWUP EMAIL RE SAME (.5); PREP FOR CALL WITH UCC RE VENDOR ITEMS (.3); CALL WITH UCC AND RELATED FOLLOWUP (.8); REVISE MOTION TO DISMISS OBJECTION (1.6)	4.50
11/16/20	SAWYER	RESEARCH AND REVISIONS TO RESPONSE TO MOTION TO DISMISS RE VENDOR AVOIDANCE ACTION	1.20
11/16/20	DEERING	EMAILS RE MAISONET POC AND SUGGESTIONS OF BANKRUPTCY (.5); REVIEW CLAIMS REGISTER AND CIRCULATE FILED POC (.3); REVISE SUGGESTION OF BANKRUPTCY (.3); FILE SUGGESTION OF BANKRUPTCY (.5)	1.60
11/17/20	BEVILLE	ANALYSIS REGARDING STATUS OF VENDOR ACTIONS (.3); ANALYSIS REGARDING RESPONSE TO MOTION TO DISMISS (.3); CONFERENCE CALL WITH VENDOR COUNSEL (.3)	0.90
11/17/20	SAWYER	CALL WITH TEAM AND DGC RE PREPARATION FOR CALL WITH VENDOR'S COUNSEL RE OUTSTANDING DILIGENCE REQUEST ITEMS	0.40
11/17/20	SAWYER	RESEARCH RE RESPONSE TO MOTION TO DISMISS RE VENDOR ACTIONS (1.3); REVISE SAME (.7)	2.00
11/17/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS	0.50
11/17/20	SAWYER	VARIOUS CORRESPONDENCE WITH T. AXELROD AND VENDOR'S COUNSEL RE SETTLEMENT DISCUSSIONS IN VENDOR ACTIONS	1.60
11/17/20	SAWYER	CALL WITH C. INFANTE RE VARIOUS OUTSTANDING VENDOR ITEMS RE VENDOR AVOIDANCE ACTIONS	0.20
11/17/20	AXELROD	DRAFT AND REVISE EVERTEC MOTION TO DISMISS RESPONSE (6.3); STRATEGIZE AND EMAILS AND CALLS WITH EVERTEC COUNSEL RE SCHEDULING AND SETTLEMENT ISSUES (1.1); CALL WITH DGC RE PITNEY BOWES (.4); CALL WITH COUNSEL RE TOLLED PARTY (.5)	8.30
11/17/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	1.00
11/17/20	RINNE	STRATEGIZE WITH DGC REGARDING CALL WITH COUNSEL FOR PITNEY BOWES (.3); COORDINATE COMPILATION OF ADDITIONAL OUTSTANDING EXHIBITS FOR DEFAULT DEFENDANT MOTIONS (.3)	0.60
11/18/20	RINNE	ANALYZE DGC RECOMMENDATIONS REGARDING ADDITIONAL DEFAULT DEFENDANTS (.1); CORRESPOND WITH M. SAWYER AND T. AXELROD REGARDING PITNEY BOWES CALL (.1)	0.20
11/18/20	SAWYER	FACILITATE EXECUTION OF NDA (.4); REVISE RECOMMENDATION MEMOS AND SEND TO UCC FOR REVIEW (.6); VARIOUS CORRESPONDENCE WITH TEAM AND DGC RE VENDOR ACTION ITEMS AND STRATEGY (.8)	1.80





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11/18/20	SAWYER	REVISE EXTENSION MOTION RE VENDOR AVOIDANCE ACTIONS (1.5); CALL WITH T. AXELROD RE SAME (.2); NUMEROUS CORRESPONDENCE WITH DGC RE EXHIBIT (.4); FACILITATE FILING RE SAME (.3)	2.40
11/18/20	SAWYER	RESEARCH RE PREFERENCE DEFENSES	1.10
11/18/20	SAWYER	CALL WITH VENDOR'S COUNSEL RE MISSING DILIGENCE ITEMS FOR INFORMAL RESOLUTION OF AVOIDANCE ACTIONS	0.40
11/18/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS RE VENDOR ACTIONS	0.30
11/18/20	AXELROD	RESEARCH AND REVISE EVERTEC OBJECTION (4.3); REVIEW AND COMMENT RE VENDOR REC MEMOS (.5); CALLS WITH UCC AND WORKING GROUP RE SETTLEMENT NOTICE FORM (.4); CALL WITH PITNEY BOWES RE DILIGENCE PROCESS (.4); PREP FOR PEARSON SETTLEMENT CALL (.2); PEARSON CALLS (.5); FOLLOWUP RE NEXT STEPS TO CONSUMMATE SETTLEMENT (.5)	6.80
11/18/20	AXELROD	EMAILS WITH EVERTEC RE SETTLEMENT	0.40
11/18/20	SAWYER	CORRESPONDENCE WITH DGC RE RECOMMENDATION MEMO DILIGENCE ITEMS	0.20
11/18/20	DEERING	REVIEW (.3), FINALIZE AND FILE FOURTH MOTION TO EXTEND VENDOR LITIGATION DEADLINES (.6), COORDINATE SERVICE OF SAME (.2) AND FOLLOW-UP RE SAME (.2)	1.30
11/19/20	BEVILLE	REVISE SETTLEMENT DOCUMENTS FOR VENDOR ACTION (.5); REVIEW/REVISE RESPONSE TO EVERTEC MOTION TO DISMISS (1.1); CORRESPONDENCE REGARDING NEXT STEPS WITH RESPECT TO EVERTEC PROPOSAL (.3); REVIEW NOTICE OF AMENDED PROPOSED ORDER (.1)	2.00
11/19/20	RINNE	REVISE MOTION FOR DEFAULT JUDGMENT PAPERS REGARDING VENDOR PUERTO NUEVO SECURITY (1.1); WEEKLY CALL WITH DGC REGARDING STATUS OF DEFAULT DEFENDANT VENDORS ACTIONS (.2); CORRESPOND WITH K. SURIA REGARDING OUTSTANDING TRANSLATIONS NEEDED (.1)	1.40
11/19/20	AXELROD	REVIEW AND COMMENT RE RECOMMENDATION MEMOS (.7); REVISE FORM OF PREFERENCE AGREEMENT AND CIRCULATE RE PEARSON (1.0); UPDATE CALL RE VENDOR ACTIONS W DGC (.4); CALLS AND EMAILS WITH EVERTEC RE SETTLEMENT/EXTENSION (1.2); REVIEW AUTHORITY DOCUMENTS RE PEARSON (.8); CALL WITH ORACLE RE PREFERENCE SETTLEMENT (.3); RESEARCH RE ORACLE ASSUMPTION DEFENSE (.9) REVIEW AND DISCUSS CARDINAL PREFERENCE DEFENSE ISSUES AND REC MEMO (.4); EMAILS WITH POPULICOM AND TRANSORE RE TIMING (.4)	6.10
11/19/20	SAWYER	MEETING WITH TEAM AND DGC RE UPDATE ON VENDOR AVOIDANCE ACTIONS AND NEXT STEPS	0.40





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11/19/20	SAWYER	RESEARCH DEFENSE TO PREFERENCE ACTION RE VENDOR AVOIDANCE ACTIONS	1.40
11/19/20	SAWYER	REVISE RESPONSE TO MOTION TO DISMISS RE VENDOR ACTION (1.4); NUMEROUS CORRESPONDENCE RE SAME (.4)	1.80
11/19/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE PREFERENCE ACTIONS (2.9); CALL WITH B. WEXLER RE SAME (.6)	3.50
11/19/20	SAWYER	CALL WITH VENDOR'S COUNSEL RE PROPOSED SETTLEMENT AND FOLLOW-UP OF SAME	0.30
11/19/20	SAWYER	EMAIL CORRESPONDENCE WITH UCC COUNSEL RE PREFERENCE RECOMMENDATIONS	0.30
11/19/20	SAWYER	DRAFT NOTICE OF SUBSTITUTION OF DOCUMENT RE EXTENSION MOTION (1.5); CORRESPONDENCE RE SAME (.3)	1.80
11/19/20	SAWYER	CORRESPONDENCE WITH DGC AND VENDORS' COUNSELS RE EXTENSION MOTION	0.40
11/19/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS RE VENDOR ACTIONS	0.50
11/20/20	BEVILLE	ANALYZE PROPOSED VENDOR SETTLEMENT RECOMMENDATION (.3); REVIEW DRAFT NOTICE OF AMENDED PROPOSED ORDER (.1); ANALYSIS REGARDING DISCUSSIONS / NEXT STEPS WITH EVERTEC ACTION (.4)	0.80
11/20/20	RINNE	REVISE MOTION FOR DEFAULT JUDGMENT PAPERS REGARDING VENDOR PUERTO NUEVO SECURITY	0.20
11/20/20	SAWYER	FACILITATE EXECUTION OF TOLLING AGREEMENT EXTENSIONS (.6); CALL WITH VENDOR'S COUNSEL RE SAME (.3)	0.90
11/20/20	SAWYER	FACILITATE FILING OF CORRECTED EXHIBIT A RE EXTENSION MOTION	0.30
11/20/20	SAWYER	DRAFT PREFERENCE RECOMMENDATION MEMOS (3.8); NUMEROUS CORRESPONDENCE WITH T. AXELROD AND B. WEXLER RE SAME (.8)	4.60
11/20/20	AXELROD	REVISE EVERTEC OBJECTION AND CIRCULATE (1.1); EMAILS WITH DGC AND WORKING GROUP RE RECOMMENDATIONS (.8)	1.90
11/20/20	SAWYER	PREPARE RECOMMENDATION MEMOS TO SEND TO SCC (.2); SEND SAME (.1)	0.30
11/20/20	SAWYER	REVISE MOTION TO SET ASIDE ENTRY OF DEFAULT RE VENDOR AVOIDANCE ACTIONS	0.50
11/20/20	DEERING	REVIEW AND FILE NOTICE OF SUBSTITUTION OF DOC RE FOURTH EXTENSION MOTION (.5); EMAILS WITH M. SAWYER RE SAME (.2); AND PRIMECLERK RE SERVICE OF SAME (.2)	0.90
11/22/20	SAWYER	DRAFT NOTICES OF VOLUNTARY DISMISSAL RE VENDOR ACTIONS	3.20



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11/22/20	RINNE	REVISE MOTION FOR DEFAULT JUDGMENT PAPERS REGARDING VENDOR PUERTO NUEVO SECURITY	0.10
11/22/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS	0.90
11/22/20	AXELROD	RESPOND TO EMAILS RE VENDOR LITIGATION ISSUES	0.50
11/23/20	SAWYER	DRAFT NOTICES OF VOLUNTARY DISMISSAL AND SEND TO UCC COUNSEL FOR REVIEW AND APPROVAL	1.50
11/23/20	SAWYER	CALL WITH T. AXELROD RE OUTSTANDING ITEMS IN VENDOR ACTIONS	0.20
11/23/20	SAWYER	CORRESPONDENCE WITH DGC RE REVISION OF PREFERENCE MEMORANDUMS (.3); REVISE SAME AND SEND TO UCC FOR REVIEW AND COMMENT (.4)	0.70
11/23/20	RINNE	REVISE MOTION FOR DEFAULT JUDGMENT PAPERS REGARDING VENDOR PUERTO NUEVO SECURITY AND ANALYZE ISSUES REGARDING SERVICE AND TRANSFERS	1.80
11/23/20	RINNE	CORRESPOND WITH COUNSEL FOR BANCO POPULAR REGARDING EXPIRING TOLLING AGREEMENT (.2); ANALYZE TOLLING AGREEMENTS STATUS AND UPDATE C. CASTALDI, T. AXELROD, AND M. SAWYER REGARDING SAME (.3)	0.50
11/23/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS	1.00
11/23/20	SAWYER	REVISE AND CITE CHECK RESPONSE TO MOTION TO DISMISS	0.50
11/23/20	SAWYER	CORRESPONDENCE WITH C. INFANTE RE OUTSTANDING VENDOR ITEMS	0.40
11/23/20	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR ACTIONS	2.10
11/23/20	AXELROD	EMAILS WITH WORKING GROUP RE PREFERENCE RECOMMENDATIONS (.4); EMAIL TO UCC RE ORACLE PROGRESS (.4); REVIEW FC DECISION RE ERS TAKINGS (.6)	1.40
11/24/20	BEVILLE	CORRESPONDENCE REGARDING STATUS REPORT ADDRESSING CLAWBACK DEFENDANT CONFIDENTIALITY (.2); REVIEW DRAFT STATUS REPORT (.2)	0.40
11/24/20	RINNE	ANALYZE CORRESPONDENCE REGARDING PUERTO NUEVO AVOIDANCE ACTION CLAIMS	0.20
11/24/20	SAWYER	ANALYZE DEFAULT JUDGMENT PAPERS IN VENDOR ACTIONS (.5); REVISE SAME (1.4)	1.90
11/24/20	SAWYER	DRAFT PREFERENCE MEMO RE VENDOR ACTIONS AND SEND SAME TO UCC FOR REVIEW AND COMMENT	1.90
11/24/20	SAWYER	CORRESPONDENCE WITH TEAM AND COUNSEL FOR AFAAF RE DILIGENCE ITEMS FOR PREFERENCE SETTLEMENT NEGOTIATIONS	0.30



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11/24/20	SAWYER	DRAFT JOINT STATUS REPORT RE UCC AND FOMB CONCERNING INFORMATION UNDER SEAL AND CIRCULATE TO PARTIES FOR REVIEW AND COMMENT	0.50
11/24/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS	0.30
11/24/20	AXELROD	REVIEW AND REVISE VENDOR RECOMMENDATION MEMOS	0.40
11/24/20	SAWYER	CALL WITH B. WEXLER RE PREPARE FOR PREFERENCE SETTLEMENT CALL (.3); PREPARE FOR SAME (.2); CALL RE SAME (.5)	1.00
11/25/20	RINNE	CORRESPOND WITH M. SAWYER REGARDING ADDITIONAL EDITS TO THE PUERTO NUEVO DEFAULT JUDGMENT MOTION PAPERS	0.20
11/25/20	SAWYER	REVIEW PREFERENCE DEFENSE CASE LAW FOLLOWING PREFERENCE SETTLEMENT DISCUSSIONS WITH VENDORS COUNSEL (1.0); SUMMARIZE CALL AND CASE LAW FOR T. AXELROD (.4)	1.40
11/25/20	BEVILLE	BEGIN REVIEW OF MOTION FOR DEFAULT FOR VENDOR ACTION	0.20
11/25/20	SAWYER	CORRESPONDENCE WITH B. WEXLER AND C. INFANTE RE VARIOUS VENDOR ISSUES	0.20
11/25/20	SAWYER	VARIOUS CORRESPONDENCE WITH B. RINNE AND S. BEVILLE RE MOTION FOR DEFAULT JUDGMENT IN VENDOR ACTIONS (.4); SEND SAME TO UCC COUNSELS FOR REVIEW AND COMMENT (.3)	0.70
11/25/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS	1.00
11/25/20	SAWYER	DRAFT PREFERENCE RECOMMENDATIONS (2.2); CORRESPONDENCE WITH B. WEXLER RE SAME (.2); SEND SAME TO UCC FOR REVIEW AND APPROVAL (.2)	2.60
11/25/20	SAWYER	CALL WITH C. INFANTE AND VENDOR'S COUNSEL RE TOLLING AGREEMENT EXTENSION AND DILIGENCE STATUS UPDATE	0.30
11/25/20	SAWYER	REVISE VENDOR RECOMMENDATION MEMOS AND SEND TO T. AXELROD AND UCC COUNSELS FOR REVIEW	1.30
11/25/20	AXELROD	REVIEW AND COMMENT RE VENDOR RECOMMENDATION MEMOS AND RELATED ISSUES	0.80
11/27/20	AXELROD	ANALYSIS RE TOLLING AGMTS	0.10
11/27/20	SAWYER	FACILITATE EXECUTION OF EXTENSIONS TO TOLLING AGREEMENTS	0.50
11/29/20	SAWYER	DRAFT MOTION FOR DEFAULT PAPERS RE VENDOR AVOIDANCE ACTIONS	2.30



Date	Professional	Description	Hours
11/30/20	RINNE	ANALYZE OUTSTANDING DEFAULT JUDGMENT MOTIONS (.2); ANALYZE UPDATE FROM K. SURIA (.1); CORRESPOND WITH M. SAWYER REGARDING STATUS (.1)	0.40
11/30/20	BEVILLE	REVIEW DRAFT NOTICE OF SETTLEMENT OF VENDOR ACTION	0.10
11/30/20	SAWYER	CORRESPONDENCE WITH B. WEXLER RE REVISIONS TO PREFERENCE RECOMMENDATION MEMOS (.3); REVISIONS RE SAME (.8)	1.10
11/30/20	SAWYER	CALL WITH C. INFANTE RE OUTSTANDING ITEMS IN VENDOR ACTIONS (TOLLING AGREEMENT EXTENSIONS, DILIGENCE ITEMS)	0.20
11/30/20	SAWYER	DRAFT DEFAULT MOTION PAPERS RE VENDOR AVOIDANCE ACTION	1.40
11/30/20	SAWYER	CALL WITH T. AXELROD RE AGREEMENT WITH VENDOR REGARDING VENDOR AVOIDANCE ACTIONS	0.20
11/30/20	SAWYER	DRAFT JOINT STIPULATED AGREEMENT RE VENDOR AVOIDANCE ACTIONS (2.5); VARIOUS CORRESPONDENCE RE SAME (.6)	3.10
11/30/20	SAWYER	FACILITATE EXTENSION TO TOLLING AGREEMENT RE VENDOR AVOIDANCE ACTIONS	0.20
11/30/20	SAWYER	NUMEROUS CORRESPONDENCE WITH T. AXELROD AND B. WEXLER RE VENDOR'S PREFERENCE DEFENSE AND REVIEW DILIGENCE ITEMS RE SAME (.7); CORRESPONDENCE WITH VENDOR'S COUNSEL RE SAME (.3)	1.00
11/30/20	AXELROD	EMAILS WITH B WEXLER RE VENDOR ISSUES (.3); REVIEW DEADLINES AND UPCOMING FILINGS (.2); REVIEW EVERTEC DRAFTS AND DISCUSS FILING OPTIONS (.7); DRAFT AND DISCUSS EVERTEC AGREEMENT (.9); DRAFT AND CIRCULATE SETTLEMENT NOTICE RE PREFERENCE AGMTS (1.0); REVIEW CASE DOCKET AND UPDATES (.4)	3.50
11/30/20	SAWYER	VARIOUS CORRESPONDENCE WITH B. WEXLER AND T. AXELROD RE DILIGENCE ITEMS FOR PREFERENCE CLAIMS RE VENDOR ACTIONS	0.40
11/30/20	AXELROD	NEGOTIATE EVERTEC AGREEMENT AND COORDINATE FILING	2.40
11/30/20	DEERING	REVIEW, FINALIZE AND FILE FOURTH JOINT STATUS REPORT RE INFORMATION FILED UNDER SEAL RE MOTION TO PURSUE CERTAIN CAUSES OF ACTION (.6); EMAILS WITH M. SAWYER RE SAME (.2)	0.80
11/30/20	DEERING	REVIEW AND FINALIZE JOINT STIPULATION ON BRIEFING FOR MOTION TO DISMISS EVERTEC AND FILE (.9); FOLLOW UP RE SAME (.5)	1.40
<b>Total Hours</b>			<b>227.90</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
December 14, 2020  
Invoice 6909802  
Page 19

TIME SUMMARY

Professional	Hours		Rate	Value
SUNNI P. BEVILLE	6.20	hours at	790.00	4,898.00
BLAIR M. RINNE	11.30	hours at	790.00	8,927.00
TRISTAN G. AXELROD	58.00	hours at	790.00	45,820.00
ALEXANDRA M. DEERING	7.70	hours at	270.00	2,079.00
MATTHEW A. SAWYER	144.70	hours at	790.00	114,313.00
<b>Total Fees</b>				<b>176,037.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6909802
Date	Dec 14, 2020
Client	035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

**Remittance** 

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**Balance Due: \$180,846.00**

---

To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**PRINCIPAL CERTIFICATION**

I hereby authorize the submission of this Twenty-Fourth Monthly Fee Statement for Brown Rudnick LLP covering the period from November 1, 2020 through November 30, 2020.



---

Jaime A. El Koury  
General Counsel to the Financial Oversight  
and Management Board for Puerto Rico

**EXHIBIT G-3**

**TWENTY-FIFTH MONTHLY FEE STATEMENT  
(DECEMBER 1, 2020 THROUGH DECEMBER 31, 2020)**



**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III  
Case No. 17-BK-3283 (LTS)

(Jointly Administered)

**TWENTY-FIFTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP,  
CLAIMS COUNSEL FOR THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
FOR SERVICES AND DISBURSEMENTS FOR THE PERIOD OF  
DECEMBER 1, 2020 THROUGH DECEMBER 31, 2020**

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Commonwealth of Puerto Rico, *et al.*

January 6, 2021

FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

Client Ref. No. 35179

Invoice Nos. 6910932 and 6910933

Re: The Financial Oversight and Management Board for Puerto Rico,  
as representative of The Commonwealth of Puerto Rico, *et al.*  
Debtors under Title III  
December 1, 2020 – December 31, 2020

Professional services rendered by Brown Rudnick LLP,  
Claims Counsel for The Financial Oversight and Management Board for Puerto Rico, acting  
through its Special Claims Committee

**Total Amount of Compensation for Professional Services** **\$145,601.00**

Less Holdback as per Court Order dated June 6, 2018 [Docket No. 3269] (10%)	\$14,560.10
Interim Compensation for Professional Services (90%)	\$131,040.90
Plus Reimbursement for Actual and Necessary Expenses	\$370.10
Total Requested Payment Less Holdback <sup>2</sup>	<b>\$145,971.10</b>

<sup>2</sup> Brown Rudnick LLP reserves the right to include a gross-up amount in its interim fee application relating to any professional fee tax that is imposed on Brown Rudnick LLP. Brown Rudnick will endeavor to make any such gross-up consistent with the discussion reflected at the hearing conducted by Judge Swain on December 19, 2018 addressing the fee examiner's proposed additional presumptive standards and with any recommendation made by the fee examiner and as may be approved by the Court.

**FEE STATEMENT INDEX**

<b>Exhibit A</b>	<b>Summary of Fees and Costs by Task Code</b>
<b>Exhibit B</b>	<b>Summary of Hours and Fees by Professional</b>
<b>Exhibit C</b>	<b>Summary of Costs</b>
<b>Exhibit D</b>	<b>Time Entries for Each Professional by Task Code (Invoices)</b>

**EXHIBIT A**

<b><u>Task Code</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>	<b><u>Costs</u></b>	<b><u>Total Amount</u></b>
General /Costs Only	0.0	\$0.00	\$370.10	\$370.10
Case Administration	1.8	\$486.00	\$0.00	\$486.00
Meetings and Communications with Client	.7	\$553.00	\$0.00	\$553.00
Fee Applications	11.7	\$3,159.00	\$0.00	\$3,159.00
Avoidance Actions	183.7	\$139,507.00	\$0.00	\$139,507.00
Third Party Claims	2.4	\$1,896.00	\$0.00	\$1,896.00
<b>TOTAL</b>	<b>200.3</b>	<b>\$145,601.00</b>	<b>\$370.10</b>	<b>\$145,971.10</b>

**EXHIBIT B**

**SERVICES RENDERED BY  
BROWN RUDNICK LLP**

**COMMENCING DECEMBER 1, 2020 THROUGH DECEMBER 31, 2020**

**TIME AND COMPENSATION BREAKDOWN**

<b>Partners and Of Counsel</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Sunni P. Beville	Partner; Admitted to Massachusetts Bar in 2002; Restructuring	\$790.00	3.7	\$2,923.00
Cathrine M. Castaldi	Partner; Admitted to California Bar in 1991; Restructuring	\$790.00	.3	\$237.00
<b>TOTAL</b>			<b>4.0</b>	<b>\$3,160.00</b>

<b>Associates</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Tristan G. Axelrod	Associate; Admitted to Massachusetts Bar in 2014; Restructuring	\$790.00	33.9	\$26,781.00
Blair Rinne	Associate; Admitted to Massachusetts Bar in 2014; Litigation	\$790.00	37.8	\$29,862.00
Matthew Sawyer	Associate; Admitted to Massachusetts Bar in 2019; Restructuring	\$790.00	100.3	\$79,237.00
<b>TOTAL</b>			<b>172.0</b>	<b>\$135,880.00</b>

<b>Paralegals and Other Professionals</b>	<b>Position; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Harriet E. Cohen	N/A; Paralegal with over 30 years' experience; Restructuring	\$270.00	11.7	\$3,159.00
Alexandra M. Deering	N/A; Paralegal with over 5 years' experience; Restructuring	\$270.00	12.4	\$3,348.00
Elizabeth G, Hosang	N/A; Paralegal with over 15 years' experience; Litigation & Arbitration	\$270.00	.2	\$54.00
<b>TOTAL</b>			<b>24.3</b>	<b>\$6,561.00</b>
<b>GRAND TOTAL</b>			<b>200.3</b>	<b>\$145,601.00</b>

**EXHIBIT C**

**ACTUAL AND NECESSARY COSTS INCURRED BY  
BROWN RUDNICK LLP COMMENCING  
DECEMBER 1, 2020 THROUGH DECEMBER 31, 2020**

<u>Service</u>	<u>Cost</u>
Copies (B&W @ 10 cents per page)	\$8.40
Pacer	\$73.70
Westlaw	\$288.00
<b>TOTAL</b>	<b>\$370.10</b>



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PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910932  
Date Jan 5, 2021  
Client 035179

RE: COSTS

INVOICE

For professional services rendered in connection with the above captioned matter  
through December 31, 2020:

Matter No.	Matter Name	Fees	Costs	Total
035179.0001	COSTS	0.00	370.10	370.10
Total		0.00	370.10	370.10

Total Current Fees	\$0.00
Total Current Costs	\$370.10
<b>Total Invoice</b>	<b>\$370.10</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
 RE: COSTS  
 January 5, 2021

Invoice 6910932  
 Page 2

**COST DETAIL**

<b>Date</b>	<b>Description</b>	<b>Value</b>
11/01/20	PACER	16.90
11/03/20	COPIES	0.30
11/03/20	COPIES	0.10
11/03/20	COPIES	0.10
11/03/20	COPIES	0.20
11/03/20	COPIES	0.50
12/01/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	15.00
12/01/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	99.00
12/01/20	PACER	18.20
12/01/20	PACER	38.60
12/03/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	10.00
12/07/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	10.00
12/08/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	15.00
12/08/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	99.00
12/10/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
12/15/20	COPIES	0.20
12/15/20	COPIES	0.10
12/15/20	COPIES	0.10
12/15/20	COPIES	0.10
12/15/20	COPIES	0.10
12/15/20	COPIES	0.10
12/15/20	COPIES	0.10
12/15/20	COPIES	0.40
12/15/20	COPIES	2.00
12/17/20	COPIES	0.80
12/17/20	COPIES	0.80
12/17/20	COPIES	0.80
12/17/20	COPIES	0.80
12/17/20	COPIES	0.80
12/17/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	20.00
12/17/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	10.00
12/21/20	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	5.00
<b>Total Costs</b>		<b>370.10</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
RE: COSTS  
January 5, 2021

Invoice 6910932  
Page 3

COST SUMMARY

Description	Value
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	288.00
PACER	73.70
COPIES	8.40
<b>Total Costs</b>	<b>370.10</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6910932
Date	Jan 5, 2021
Client	035179

RE: COSTS

**Remittance** 

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**Balance Due: \$370.10**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**EXHIBIT D**

**Time Entries for Each Professional By Task Code (Invoice)**

brownrudnick

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910933  
Date Jan 5, 2021  
Client 035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

INVOICE

For professional services rendered in connection with the above captioned matter  
through December 31, 2020:

Matter No.	Matter Name	Fees	Costs	Total
035179.0002	CASE ADMINISTRATION	486.00	0.00	486.00
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	553.00	0.00	553.00
035179.0004	FEE APPLICATIONS	3,159.00	0.00	3,159.00
035179.0015	AVOIDANCE ACTIONS	139,507.00	0.00	139,507.00
035179.0017	THIRD PARTY CLAIMS	1,896.00	0.00	1,896.00
<b>Total</b>		<b>145,601.00</b>	<b>0.00</b>	<b>145,601.00</b>

Total Current Fees \$145,601.00

Total Current Costs \$0.00

**Total Invoice \$145,601.00**

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910933  
Date Jan 5, 2021  
Client 035179

RE: CASE ADMINISTRATION

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through December 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0002	CASE ADMINISTRATION	486.00	0.00	486.00
<b>Total</b>		<b>486.00</b>	<b>0.00</b>	<b>486.00</b>

Total Current Fees \$486.00

Total Current Costs \$0.00

**Total Invoice \$486.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
January 5, 2021  
Invoice 6910933  
Page 3

RE: CASE ADMINISTRATION

TIME DETAIL

Date	Professional	Description	Hours
12/10/20	DEERING	REVIEW DOCKET AND UPDATE CASE CALENDAR RE SAME	0.50
12/14/20	DEERING	REVIEW DOCKET AND UPDATE CASE CALENDAR	0.80
12/30/20	DEERING	REVIEW DOCKET AND UPDATE CASE CALENDAR	0.50
Total Hours			1.80

TIME SUMMARY

Professional	Hours	Rate	Value
ALEXANDRA M. DEERING	1.80 hours at	270.00	486.00
Total Fees			486.00

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175



**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910933  
Date Jan 5, 2021  
Client 035179

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through December 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	553.00	0.00	553.00
<b>Total</b>		<b>553.00</b>	<b>0.00</b>	<b>553.00</b>

Total Current Fees \$553.00

Total Current Costs \$0.00

**Total Invoice \$553.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
January 5, 2021  
Invoice 6910933  
Page 5

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

TIME DETAIL

Date	Professional	Description	Hours
12/01/20	BEVILLE	CORRESPONDENCE REGARDING CLIENT CALL	0.10
12/07/20	BEVILLE	ANALYSIS OF AGENDA FOR CLIENT CALL (.1); CORRESPONDENCE TO CLIENTS REGARDING POSTPONEMENT OF CALL (.1)	0.20
12/14/20	BEVILLE	CORRESPONDENCE REGARDING CASE UPDATE FOR CLIENT	0.10
12/21/20	BEVILLE	CORRESPONDENCE REGARDING AGENDA / CANCELLATION OF CLIENT MEETING	0.20
12/28/20	BEVILLE	CORRESPONDENCE REGARDING CLIENT CALL	0.10
<b>Total Hours</b>			<b>0.70</b>

TIME SUMMARY

Professional	Hours	Rate	Value
SUNNI P. BEVILLE	0.70 hours at	790.00	553.00
<b>Total Fees</b>			<b>553.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910933  
Date Jan 5, 2021  
Client 035179

RE: FEE APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through December 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0004	FEE APPLICATIONS	3,159.00	0.00	3,159.00
<b>Total</b>		<b>3,159.00</b>	<b>0.00</b>	<b>3,159.00</b>

Total Current Fees \$3,159.00

Total Current Costs \$0.00

**Total Invoice \$3,159.00**



RE: FEE APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours
12/04/20	COHEN	EMAILS WITH I. CARDONA REGARDING STATEMENTS AND REVIEW (.2); WORK ON MULTIPLE BUDGETS AND RECONCILIATIONS (.9); WORK ON MONTHLY FEE STATEMENTS AND TITLE III DECLARATIONS (.8)	1.90
12/07/20	COHEN	PREPARE BROWN RUDNICK TITLE III DECLARATIONS FOR OCTOBER 2020 AND SUBMIT AS REQUIRED (.6); SEND CARDONA NOVEMBER FEE STATEMENTS TO J. EL KOURY FOR PRINCIPAL CERTIFICATION (.2); EMAILS WITH I. CARDONA, C. BURKE, S. BEVILLE AND V. BLAY SOLER REGARDING STATUS AND PENDING ISSUES (.4); WORK ON BUDGET ISSUES AND SEND TO S. BEVILLE FOR REVIEW (.5)	1.70
12/08/20	COHEN	RESPOND TO INQUIREY AND SEND DOCUMENTS TO V. BLAY SOLER AS REQUESTED (.2); WORK ON NOVEMBER 2020 REVIEW OF TIME AND COSTS (.8) - W/O	1.00
12/10/20	COHEN	EMAILS WITH C. BURKE, J. EL KOURY AND I. CARDONA REGARDING MONTHLY FEE STATEMENTS (.4); SUBMIT CARDONA NOVEMBER FEE STATEMENTS PURSUANT TO INTERIM COMP ORDER (.3); SUBMIT DICICCO GULMAN OCTOBER STATEMENTS PURSUANT TO INTERIM COMP ORDER (.3)	1.00
12/11/20	COHEN	EMAILS WITH S. BEVILLE REGARDING STATUS (.2); EMAIL TO C. BURKE REGARDING STATUS AND BUDGETS (.1)	0.30
12/14/20	COHEN	WORK ON MONTHLY FEE STATEMENTS AND STATUS	0.40
12/15/20	COHEN	WORK ON MONTHLY FEE STATEMENTS AND STATUS (.2); REVIEW DOCUMENTS AND EMAIL TO C. BURKE (.2)	0.40
12/16/20	COHEN	WORK ON MONTHLY FEE STATEMENTS (.3); COMPILE DICICCO GULMAN MATERIALS FOR INTERIM FILINGS (.4)	0.70
12/18/20	COHEN	EMAIL TO V. BLAY SOLER REGARDING STATUS (.1); REVIEW CARDONA DOCUMENTS AND STATUS (.2); WORK ON BROWN RUDNICK MONTHLY FEE STATEMENTS FOR NOVEMBER (.4); COMPILE DGC MATERIALS FOR FILING (.3)	1.00
12/21/20	COHEN	FINALIZE AND SUBMIT CARDONA TITLE III STATEMENTS FOR NOVEMBER (.3); WORK ON BUDGETS (.1); EMAILS WITH C. BURKE REGARDING FEE APPLICATIONS AND EMAILS WITH PRIME CLERK TEAM (.4); EFFECTUATE FILING OF DGC INTERIM FEE APPLICATIONS (.9); WORK ON BROWN RUDNICK MONTHLY FEE STATEMENTS (.4)	2.10



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
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Date	Professional	Description	Hours
12/22/20	COHEN	PREPARE DRAFT BUDGETS FOR JANUARY (.2); EMAILS WITH C. BURKE REGARDING STATUS OF SUBMISSION (.2); FINALIZE BROWN RUDNICK NOVEMBER FEE STATEMENTS AND SUBMIT ACCORDINGLY (.8)	1.20
<b>Total Hours</b>			<b>11.70</b>

TIME SUMMARY

Professional	Hours	Rate	Value
HARRIET E. COHEN	11.70 hours at	270.00	3,159.00
<b>Total Fees</b>			<b>3,159.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910933  
Date Jan 5, 2021  
Client 035179

RE: AVOIDANCE ACTIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter through December 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0015	AVOIDANCE ACTIONS	139,507.00	0.00	139,507.00
<b>Total</b>		<b>139,507.00</b>	<b>0.00</b>	<b>139,507.00</b>

Total Current Fees \$139,507.00

Total Current Costs \$0.00

**Total Invoice \$139,507.00**



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RE: AVOIDANCE ACTIONS

TIME DETAIL

Date	Professional	Description	Hours
12/01/20	RINNE	ANALYZE AND REVISE DRAFT MOTION FOR DEFAULT JUDGMENT REGARDING DEFENDANT (1.6); COORDINATE NEXT STEPS IN FINALIZING MOTION (.2); STRATEGIZE WITH M. SAWYER REGARDING SAME (.2)	2.00
12/01/20	SAWYER	CALL WITH T. AXELROD RE NEXT STEPS FOLLOWING JOINT STIPULATION WITH VENDOR (.1); CORRESPONDENCE WITH VENDOR'S COUNSEL RE SAME (.3); DRAFT MOTIONS FOR DEFAULT JUDGMENT (6.0); NUMEROUS CORRESPONDENCE WITH TEAM AND UCC COUNSEL RE SAME (1.4); CREATE AGENDA FOR DGC MEETING ON 12/3 (.2); CREATE MASTER SPREADSHEET OF OUTSTANDING VENDOR ITEMS FOR USE IN DILIGENCE AND RECOMMENDATIONS (.8)	8.80
12/01/20	AXELROD	EMAILS WITH COURT AND CALLS WITH COUNSEL RE FILINGS (.4); EMAILS RE VENDOR RECOMMENDATIONS AND NEXT FILINGS (.3)	0.70
12/02/20	BEVILLE	REVIEW DRAFT ESCROW AGREEMENT (.2); CORRESPONDENCE REGARDING DEFAULT MOTIONS (.2); REVIEW HEARING AGENDA ITEMS REGARDING EXTENSION MOTION (.2)	0.60
12/02/20	SAWYER	PREPARE PREFERENCE RECOMMENDATIONS AND RELATED CORRESPONDENCE (.9); EMAIL CORRESPONDENCE WITH L. STAFFORD RE VENDOR POC (.2); DRAFT DEFAULT MOTION PAPERS RE VENDOR AVOIDANCE ACTIONS (2.1); REVIEW DOCKET FOR RELEVANT RECENT FILINGS AND CIRCULATE SAME TO TEAM AND UCC COUNSEL FOR REVIEW (.3); CREATE MASTER SPREADSHEET RE OUTSTANDING VENDOR AVOIDANCE ACTIONS (3.0); CALL WITH COUNSEL RE UPDATE ON TOLLED PARTY AND NEXT STEPS (.2); CALL WITH B. WEXLER AND T. AXELROD RE PREPARE FOR PREFERENCE SETTLEMENT CALL (.3); CALL WITH B. WEXLER RE OUTSTANDING ITEMS IN PREFERENCE SETTLEMENT NEGOTIATIONS (1.1); REVIEW AND RESPOND TO DILIGENCE QUESTIONS FROM UCC COUNSEL RE VENDOR RECOMMENDATIONS (1.2)	9.30
12/02/20	RINNE	ANALYZE OUTSTANDING VENDOR ISSUES AND CORRESPOND INTERNALLY REGARDING UPCOMING FILINGS	0.50
12/02/20	AXELROD	REVIEW AND COMMENT RE VENDOR RECOMMENDATION MEMOS (.6); REVIEW CONFLICTS RE OUTSTANDING VENDOR ACTIONS (.5); DRAFT AGREEMENT AND FILINGS RE PEARSON (.8); PREP FOR VENDOR CALL (.4); REVIEW AND COMMENT RE SETTLEMENT ESCROW AGREEMENT (.3)	2.60



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Date	Professional	Description	Hours
12/03/20	RINNE	ANALYZE OUTSTANDING VENDOR ISSUES AND CORRESPOND INTERNALLY REGARDING UPCOMING FILINGS	1.00
12/03/20	SAWYER	DRAFT PREFERENCE RECOMMENDATIONS (2.7); DRAFT AND CIRCULATE AGENDA FOR MEETING WITH TEAM AND DGC RE VENDOR ACTIONS (.5); MEETING RE SAME (1.2); CORRESPONDENCE WITH T. AXELROD AND B. WEXLER RE UCC PREFERENCE RECOMMENDATION QUESTIONS (.4); REVISIONS TO RESPONSES RE SAME (8); SEND SAME TO UCC COUNSELS (.1); CALL WITH G. WILLARD RE INTERIM FEE APPLICATIONS (.4); CORRESPONDENCE WITH BRG RE SAME (.4); EMAIL CORRESPONDENCE WITH B. RINNE RE DISMISSAL OF DEFAULT DEFENDANTS (.2)	8.20
12/03/20	AXELROD	REVIEW AND COMMENT RE VENDOR MEMOS AND RESPONSES TO UCC QUESTIONS (.8); CALL WITH DGC RE STATUS ISSUES (1.2)	2.00
12/04/20	RINNE	CORRESPOND WITH M. SAWYER REGARDING UPCOMING DEFAULT JUDGMENT FILINGS	0.10
12/04/20	SAWYER	DRAFT DEFAULT MOTION EXTENSION MOTION (2.8); CALL WITH T. AXELROD AND B. WEXLER RE PREPARE FOR PREFERENCE SETTLEMENT CALL WITH VENDORS COUNSEL (.9); CALL WITH VENDORS COUNSEL RE SAME (2.0); REVIEW JOINT STATUS REPORT AND AMENDED COMPLAINT RE VENDOR AVOIDANCE ACTIONS (.3); REVISE SAME (.5)	6.50
12/04/20	AXELROD	EMAILS AND CALLS WITH R WEXLER RE PREFERENCE RESOLUTIONS (1.5); CALL WITH HUELLAS RE SAME (.5)	2.00
12/05/20	SAWYER	CONTINUE DRAFT OF DEFAULT MOTION EXTENSION MOTION AND SEND TO B. RINNE AND T. AXELROD FOR REVIEW (.8); DRAFT MOTION FOR DEFAULT JUDGMENT DOCUMENTS RE VENDOR AVOIDANCE ACTIONS (1.9)	2.70
12/06/20	RINNE	ANALYZE UPDATE FROM M. SAWYER	0.10
12/06/20	SAWYER	PREPARE FOR CALL WITH B. WEXLER RE PREFERENCE ACTION ITEMS (.2); CALL RE SAME (.8); REVISE JOINT STIPULATION RE VENDOR AVOIDANCE ACTIONS AND RELATED CORRESPONDENCE WITH T. AXELROD (.5); DRAFT RESPONSE TO VENDOR'S COUNSEL RE PREFERENCE DEFENSE (.4)	1.90
12/06/20	AXELROD	REVIEW AND COMMENT RE EVERTEC FILING	0.20
12/07/20	BEVILLE	REVIEW/REVISE DEFAULT PLEADINGS FOR VENDOR ACTION (.3); REVIEW MOTION TO EXTEND DEFAULT JUDGMENT DEADLINE (.1)	0.40





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Date	Professional	Description	Hours
12/07/20	RINNE	CORRESPOND WITH S. BEVILLE (.2); REVISED DRAFT MOTION TO DEFAULT PAPERS FOR DEFENDANT AND COORDINATE FILING OF SAME (1.2); REVISE AND FINALIZE MOTION FOR EXTENSION TO FILE ADDITIONAL DEFAULT MOTIONS (.5); ANALYZE STATUS OF ALEJANDRO ESTRADA MAISONET DOCKET (.2); UPDATE DEFAULT DEFENDANTS TRACKER (.2)	2.30
12/07/20	SAWYER	NUMEROUS CORRESPONDENCE WITH T. AXELROD AND B. WEXLER RE OUTSTANDING ITEMS IN PREFERENCE SETTLEMENT NEGOTIATIONS (.4); DRAFT MOTION FOR DEFAULT JUDGMENT DOCUMENTS RE VENDOR AVOIDANCE ACTIONS (3.0); DRAFT PREFERENCE RECOMMENDATIONS RE VENDOR AVOIDANCE ACTIONS (2.9); CORRESPONDENCE WITH T. AXELROD AND VENDOR'S COUNSEL RE STATUS UPDATE AND AMENDED COMPLAINT AND FACILITATE FILING OF SAME (.5); CORRESPONDENCE WITH B. WEXLER AND T. AXELROD RE CERTAIN DEFENSES TO PREFERENCE LIABILITY (.3); STRATEGIZE RE: VENDOR AVOIDANCE ACTIONS STATUS UPDATE AND OUTSTANDING ITEMS (.9)	8.00
12/07/20	AXELROD	EMAILS WITH WORKING GROUP RE VENDOR RECOMMENDATIONS AND NEXT STEPS (.3); ANALYZE DEFAULT JUDGEMENT MOTION (.1); EMAIL TO S BEVILLE RE OPEN ITEMS AND NEXT STEPS (.3); CATCHUP CALL WITH S BEVILLE RE VENDOR ISSUES AND CIRCULATE DRAFTS (.5)	1.20
12/07/20	DEERING	CITE CHECK MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR DEFAULT JUDGEMENT (1.0) AND STRATEGIZE WITH M. SAWYER AND B. RINNE RE SAME (.4)	1.40
12/08/20	SAWYER	REVIEW AND REVISE MOTION FOR DEFAULT JUDGMENT DOCUMENTS AND PREPARE SAME FOR FILING (1.5); REVISE MOTION FOR EXTENSION OF MOTION FOR DEFAULT JUDGMENT DEADLINES AND CIRCULATE SAME TO UCC COUNSEL FOR REVIEW AND APPROVAL (.8); REVIEW COMMENTS AND RELATED CORRESPONDENCE WITH T. AXELROD AND B. RINNE RE SAME (.3); CORRESPONDENCE WITH B. WEXLER RE PREFERENCE RECOMMENDATIONS (.6)	3.20
12/08/20	RINNE	REVISE, FINALIZE, AND COORDINATE PRODUCTION FOR MOTION FOR DEFAULT JUDGMENT (.9); REVISE MOTION FOR EXTENSION OF TIME AND CORRESPOND WITH M. SAWYER REGARDING SAME (.3)	1.20
12/08/20	AXELROD	DRAFT EMAIL TO CLIENT RE TOLLED PARTY (.7); STRATEGIZE RE PREFERENCE ISSUES(.6); NOTE TO UCC RE PREFERENCE ISSUES (.2); EMAIL WITH WORKING GROUP RE PREFERENCE ISSUES (.2)	1.70



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Date	Professional	Description	Hours
12/08/20	DEERING	CITE CHECK REVISED MEMO OF LAW IN SUPPORT OF MOTION FOR DEFAULT JUDGEMENT AGAINST PUERTO NUEVO (.8); REVIEW AND FINALIZE MOTION FOR DEFAULT JUDGMENT AGAINST PUERTO NUEVO (.6); FILE SAME (.5); EMAILS WITH M. SAWYER AND B. RINNE RE SAME (.3); AND COORDINATE SERVICE OF SAME WITH PRIMECLERK (.2)	2.40
12/09/20	BEVILLE	ANALYSIS REGARDING OPEN ISSUES RELATING TO VENDOR ACTIONS	0.40
12/09/20	RINNE	ANALYZE AND REVISE DEFAULT JUDGMENT MOTIONS REGARDING MULTIPLE DEFENDANTS (4.7); ANALYZE SERVICE ISSUE AND CORRESPOND WITH K. SURIA REGARDING SUPPORTING DOCUMENTS FOR SAME (.6); UPDATE EXHIBITS TO INCLUDE WITH DEFAULT JUDGMENT MOTIONS (.4); COORDINATE FILING OF EXTENSION MOTION (.2)	5.90
12/09/20	SAWYER	REVISE MOTION FOR DEFAULT JUDGMENT DOCS RE VENDOR ACTIONS AND RELATED COMMUNICATIONS (3.4); CORRESPONDENCE WITH B. WEXLER RE PREFERENCE RECOMMENDATIONS (.4); REVISE COMPLAINT PURSUANT TO COURT'S ORDER RE STIPULATION AS TO LITIGATION SCHEDULE IN VENDOR ACTION (.3); CALL WITH T. AXELROD AND UCC COUNSEL RE VENDOR DILIGENCE QUESTIONS (.5); CALL WITH T. AXELROD RE FOLLOW-UP OF SAME (.1); REVIEW DILIGENCE THAT FORMS BASIS FOR RECOMMENDATION (.4); PREPARE FOR VENDOR SETTLEMENT CALL RE PREFERENCE CLAIM INCLUDING CALL WITH T. AXELROD AND B. WEXLER (.5); CALL RE SAME (.6); CREATE AND CIRCULATE AGENDA FOR TEAM 12/10 TEAM CALL (.4) AND RELATED CORRESPONDENCE (.3)	6.90
12/09/20	AXELROD	EMAILS WITH R WEXLER RE SCHEDULING (.2); CALL WITH UCC RE PREFERENCE CONCERNS (.5); FOLLOWUP FROM UCC CALL (.1); PREP FOR PREFERENCE NEGOTIATION (.5); CALL WITH ESC (.6)	1.90
12/09/20	DEERING	FINALIZE AND FILE AMENDED COMPLAINT (.6); EMAILS WITH M. SAWYER RE SAME (.2); COORDINATE SERVICE OF SAME (.2); FINALIZE EXHIBITS TO AND FILE MOTION TO EXTEND DEADLINE RE DEFAULT JUDGMENT MOTIONS (.8); EMAILS WITH M. SAWYER RE SAME (.2); COORDINATE SERVICE OF SAME (.2)	1.80
12/09/20	DEERING	RESEARCH ECF NOTIFICATIONS FOR MAISONET CH 7 PLEADINGS (.4) AND EMAILS WITH M. SAWYER AND B. RINNE RE SAME (.3)	0.70
12/10/20	BEVILLE	CORRESPONDENCE REGARDING LITIGATION SCHEDULE FOR A VENDOR ACTION (.1); ANALYSIS REGARDING NEXT STEPS WITH RESPECT TO TOLLED VENDOR (.3); CORRESPONDENCE TO SCC REGARDING VENDOR ACTION RECOMMENDATION (.2)	0.60



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12/10/20	SAWYER	CONTINUE REVISIONS TO DEFAULT JUDGMENT MOTIONS AND CIRCULATE TO UCC COUNSELS FOR REVIEW AND COMMENT (.6); RELATED CORRESPONDENCE WITH B. RINNE, T. AXELROD, AND DGC RE SAME (.5); CORRESPONDENCE WITH COUNSEL FOR THE FOMB RE POC ANALYSIS (.1); CALL WITH DGC AND TEAM RE OUTSTANDING VENDOR ACTIONS ITEMS (1.0); CORRESPONDENCE WITH B. WEXLER RE PREFERENCE SETTLEMENT DILIGENCE (.4); CALL WITH UCC COUNSEL RE OPEN ITEMS IN VENDOR ACTIONS (1.2); CALL WITH T. AXELROD RE FOLLOW-UP OF SAME (.3)	4.10
12/10/20	RINNE	WEEKLY STRATEGY CALL WITH DGC REGARDING DEFAULT DEFENDANTS AND TOLLING AGREEMENT ISSUES (.5); REVISING DEFAULT DEFENDANT MOTIONS AND STRATEGIZING WITH M. SAWYER REGARDING SAME (.8)	1.30
12/10/20	AXELROD	DRAFT STIPULATION RE SCHEDULE (.4); REVIEW AND NEGOTIATE CHANGES TO STIPULATION (.4); CALL WITH DGC RE VENDOR LITIGATION ISSUES (1.0); CALLS WITH S. BEVILLE AND J. EL KOURY RE TOLLED PARTY (.7); CALL WITH UCC RE VARIOUS VENDOR LITIGATION ISSUES, RELATED FOLLOWUP (1.4); EMAILS WITH R WEXLER AND WORKING GROUP RE NEGOTIATION SCHEDULE (.2)	4.10
12/11/20	SAWYER	REVIEW AND REVISE JOINT STIPULATION RE VENDOR AVOIDANCE ACTION (.5); PREPARE FOR PREFERENCE SETTLEMENT DISCUSSION (6); CALL WITH VENDOR'S COUNSEL RE SAME (.6); CALL WITH T. AXELROD RE FOLLOW-UP (.2); CALL WITH E. DA SILVA RE MOTION FOR DEFAULT JUDGMENT REVISIONS (.1); CORRESPONDENCE WITH B. RINNE AND T. AXELROD RE SAME (.2)	2.20
12/11/20	AXELROD	PREP FOR UCC CALL (.6); CALL WITH UCC'S COUNSEL (.5)	1.10
12/11/20	RINNE	ANALYZE COMMENTS FROM UCC COUNSEL REGARDING DEFAULT DEFENDANT MOTIONS AND UPDATE FROM DGC IN RESPONSE (.2); CORRESPOND WITH M. SAWYER REGARDING SAME (.1)	0.30
12/11/20	HOSANG	FINALIZE AND ELECTRONICALLY FILE JOIN STIPULATION RE MOTIONS TO DISMISS BRIEFING	0.20
12/12/20	RINNE	ANALYZE REVISIONS TO DEFAULT JUDGMENT MOTIONS FROM UCC COUNSEL (.4); CORRESPOND WITH M. SAWYER REGARDING SAME (.2)	0.60
12/13/20	SAWYER	CORRESPONDENCE WITH B. WEXLER AND COUNSEL FOR VENDOR RE PREFERENCE DEFENSE (.3); REVISE MOTION FOR DEFAULT JUDGMENTS RE VENDOR AVOIDANCE ACTIONS (1.4)	1.70



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Date	Professional	Description	Hours
12/13/20	RINNE	CORRESPOND WITH M. SAWYER AND DGC REGARDING COMMENTS FROM UCC COUNSEL TO TACTICAL EQUIPMENT CONSULTANTS AND PERFECT CLEANING DEFAULT JUDGMENT MOTIONS (.3); REVISE DEFAULT JUDGMENT PAPERS FOR TRINITY METAL ROOF AND CORRESPOND WITH M. SAWYER REGARDING SAME (1.6)	1.90
12/14/20	RINNE	CALL AND CORRESPONDING WITH DGC AND M. SAWYER REGARDING ISSUES WITH CERTAIN DEFAULT MOTION PAPERS (.4); ANALYZE REVISED LANGUAGE FOR DECLARATION FROM DGC (.3); REVISE DRAFT DEFAULT MOTION PAPERS FOR LLC (1.9); STRATEGIZE WITH M. SAWYER REGARDING NEXT STEPS FOR FILING DEFAULT JUDGMENT MOTIONS (.4); UPDATE S. BEVILLE REGARDING MOTION STATUS (.1)	3.10
12/14/20	SAWYER	REVISE MOTION FOR DEFAULT JUDGMENT PAPERS RE VENDOR ACTIONS (1.5); CALL WITH DGC AND B. RINNE RE SAME (.4)	1.90
12/14/20	AXELROD	EMAILS WITH WORKING GROUP, R WEXLER AND VENDORS RE VARIOUS LITIGATION ISSUES	0.70
12/15/20	RINNE	REVISING DEFAULT JUDGMENT MOTIONS AND PREPARING FOR CIRCULATION TO UCC COUNSEL, S. BEVILLE, AND LOCAL COUNSEL (1.1); STRATEGIZING WITH M. SAWYER REGARDING SAME (.3)	1.40
12/15/20	SAWYER	REVISE MOTION FOR DEFAULT JUDGMENT DOCUMENTS RE VENDOR ACTIONS (2.7); PREPARE FOR CALL WITH VENDOR'S COUNSEL RE PREFERENCE SETTLEMENT NEGOTIATIONS (.4); CALL RE SAME (1.0); CALL WITH B. WEXLER RE FOLLOW-UP OF SAME (.1); CALL WITH DGC TO DISCUSS DILIGENCE UPDATE ON VENDOR RE VENDOR ACTIONS (.4); SUMMARIZE SAME FOR T. AXELROD INCLUDING PROPOSED NEXT STEPS (.3)	4.90
12/15/20	AXELROD	PREP FOR CALL WITH TOLLED PARTY (.2); CALL WITH TOLLED PARTY COUNSEL (.7); CALL WITH TOLLED PARTY COUNSEL (.3); EMAILS WITH UCC AND WORKING GROUP RE PREFERENCE ISSUES (.6)	1.80
12/16/20	RINNE	STRATEGIZE WITH T. AXELROD AND M. SAWYER REGARDING COMMENTS FROM UCC COUNSEL TO DEFAULT JUDGMENT MOTIONS (.5); CALL WITH UCC COUNSEL REGARDING DEFAULT JUDGMENT MOTIONS (.5); CALL WITH DGC AND M. SAWYER REGARDING REVISIONS TO DEFAULT JUDGMENT MOTIONS (.5); ANALYZE, REVISE, AND PREPARE FOR FILINGS OF DEFAULT JUDGMENT MOTIONS, AND CORRESPOND REGARDING SAME (1.4)	2.90



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Date	Professional	Description	Hours
12/16/20	AXELROD	PREP FOR TOLLED PARTY PREFERENCE CALL (.6); CALL WITH TOLLED PARTY (.7); EMAILS WITH TOLLED PARTY RE ANSWER AND SCHEDULING ETC (.4); REVIEW DEFAULT JUDGMENT DRAFTS AND UCC COMMENTS (1.0); CALL WITH UCC RE SAME (1.0); EDIT DEFAULT JUDGMENT DRAFTS AND EMAILS RE SAME (.4)	4.10
12/16/20	SAWYER	PREPARE FOR CALL WITH VENDOR RE PREFERENCE SETTLEMENT DISCUSSIONS (.5); CALL RE SAME (.7); RELATED FOLLOW-UP CALLS (.3); CALL WITH B. WEXLER RE OUTSTANDING PREFERENCE DILIGENCE ITEMS (.2); CALL WITH B. RINNE AND T. AXELROD RE MOTIONS FOR DEFAULT JUDGMENT RE VENDOR AVOIDANCE ACTIONS (.2); CALL WITH UCC AND TEAM RE SAME (1.0); CALL WITH B. RINNE AND DGC RE ACTION ITEMS FOLLOWING EARLIER CALLS (.5)	3.40
12/17/20	BEVILLE	ANALYSIS REGARDING DEFAULT VENDOR DEFENDANTS (.2); ANALYSIS REGARDING POTENTIAL PREFERENCE SETTLEMENT (.2)	0.40
12/17/20	RINNE	REVISE AND FINALIZE DEFAULT JUDGMENT MOTIONS (3.2); CALL WITH DGC REGARDING REVISIONS TO DECLARATIONS IN SUPPORT (.5); STRATEGIZE WITH M. SAWYER AND T. AXELROD REGARDING SAME (.5)	4.20
12/17/20	SAWYER	PREPARE FOR PREFERENCE SETTLEMENT DISCUSSIONS AND CALLS RE SAME (2.3); ANALYZE PREFERENCE DEFENSE SUPPORT SENT BY VENDORS COUNSEL AND RELATED CORRESPONDENCE WITH T. AXELROD (1.3); DRAFT PROPOSED SCHEDULING ORDER RE VENDOR AVOIDANCE ACTION AND SEND TO T. AXELROD FOR COMMENT (1.2); CALLS WITH B. RINNE, T. AXELROD AND DGC RE DEFAULT VENDOR ITEMS, RECENTLY ENGAGED VENDOR ITEMS AND NEXT STEPS (1.2); REVISE MOTION FOR DEFAULT JUDGMENT DOCUMENTS AND RELATED CORRESPONDENCE WITH B. RINNE AND T. AXELROD (2.2)	8.20
12/17/20	AXELROD	PREFERENCE CALL WITH MCG (.7); RESEARCH RE COMPUTER LEARNING CENTER PREFERENCE DEFENSE (2.9); PREP FOR ORACLE CALL (.2); ORACLE CALL (1.0); CALLS WITH DGC AND TEAM RE DEFAULT MOTIONS (1.0)	5.80
12/18/20	BEVILLE	REVIEW/REVISE DRAFT DECLARATIONS IN SUPPORT OF DEFAULT MOTION FOR VENDOR ACTION (.2); REVIEW/REVISE DRAFT DEFAULT MOTION/MEMORANDUM OF LAW REGARDING VENDOR ACTION (.3)	0.50
12/18/20	RINNE	REVISE, FINALIZE, AND COORDINATE FILING OF DEFAULT JUDGMENT MOTIONS WITH RESPECT TO MULTIPLE DEFENDANTS	5.70
12/18/20	AXELROD	REVIEW AND REVISE DEFAULT JUDGMENT MOTIONS AND EXHIBITS (.8); EMAILS WITH R WEXLER AND TEAM RE PREFERENCE MATTERS (.2)	1.00



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Date	Professional	Description	Hours
12/18/20	SAWYER	EMAIL CORRESPONDENCE WITH VENDOR AND TEAM RE TOLLING AGREEMENT EXTENSION (.3); REVISE MOTION FOR DEFAULT JUDGMENT DOCS AND RELATED CORRESPONDENCE AND PREPARE FOR FILING (4.2); CALL WITH LOCAL COUNSEL RE: PREFERENCE DEFENSE (.3)	4.80
12/18/20	DEERING	CITE CHECK MOTION FOR DEFAULT JUDGMENT AGAINST PERFECT CLEANING (.7); CITE CHECK MOTION FOR DEFAULT JUDGMENT AGAINST TRINITY METAL (.5); FINALIZE AND FILE MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS (2.4); EMAILS WITH B. RINNE AND M. SAWYER RE SAME (.4); EMAILS WITH CLAIMS AGENT RE SERVICE OF SAME (.3)	4.30
12/19/20	RINNE	ANALYZE COURT ORDER REGARDING DEFAULT JUDGMENT DEADLINE (.1); UPDATE RECORDS WITH SAME (.2)	0.30
12/20/20	SAWYER	ANALYZE TOLLING AGREEMENT EXTENSION RE VENDOR AVOIDANCE ACTION	0.30
12/21/20	RINNE	WEEKLY MEETING WITH DGC, T. AXELROD, AND M. SAWYER REGARDING STATUS OF DEFAULT DEFENDANTS	0.20
12/21/20	SAWYER	DRAFT AND CIRCULATE AGENDA FOR 12/21 MEETING WITH TEAM AND DGC (.4); FACILITATE EXECUTION OF TOLLING AGREEMENT EXTENSION RE VENDOR AVOIDANCE ACTIONS (.4); MEETING WITH TEAM AND VENDOR'S COUNSEL TO DISCUSS DILIGENCE ITEMS RE VENDOR AVOIDANCE ACTIONS (.3); REVISE PREFERENCE RECOMMENDATION AND SEND TO SCC FOR REVIEW AND APPROVAL (.8); MEETING WITH TEAM AND DGC RE OUTSTANDING ITEMS IN VENDOR ACTIONS (.6); CALL WITH A. STREHLE AND CLIENT RE DISCUSSION OF OPTIONS AND RECOMMENDED NEXT STEPS RE TOLLED PARTY LOAN (.5); ANALYZE PREFERENCE DEFENSES RAISED RE VENDOR ACTIONS (1.0); CORRESPONDENCE WITH TEAM RE SAME (.2)	4.20
12/21/20	AXELROD	EMAILS AND CALLS RE VENDOR DILIGENCE PREP (.5); CALL WITH ACR SYSTEMS RE SAME (.3); DRAFT ORACLE SETTLEMENT MATERIALS (.3); CATCHUP CALL WITH DGC (.6); REVIEW MATERIALS FROM GFR MEDIA AND NOTE TO TEAM RE SAME (.4)	2.10
12/22/20	RINNE	ANALYZE AND UPDATE DEFAULT DEFENDANT CASE FILES AND TRACKER	0.20



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Date	Professional	Description	Hours
12/22/20	SAWYER	CORRESPONDENCE WITH B. WEXLER AND T. AXELROD RE RESPONSE TO VENDOR'S COUNSEL RE PREFERENCE SETTLEMENT DISCUSSIONS (.5); ANALYZE DILIGENCE ITEMS RE VENDOR AVOIDANCE ACTIONS AND RELATED CORRESPONDENCE WITH DGC AND LOCAL COUNSEL (1.0); DRAFT RECOMMENDATION MEMO RE VENDOR AVOIDANCE ACTIONS (1.1); RELATED CORRESPONDENCE WITH TEAM (.5); CALL WITH LOCAL COUNSEL AND T. AXELROD RE DILIGENCE ITEMS RE VENDOR AVOIDANCE RECOMMENDATION (.4)	3.50
12/23/20	SAWYER	CORRESPONDENCE WITH T. AXELROD AND C. INFANTE RE DILIGENCE REGARDING VENDOR AVOIDANCE ACTION	0.10
12/23/20	CASTALDI	DRAFT EMAIL TO BLAIR RINNE RE: TOLLED PARTY AND REVIEW RESPONSE RE: SAME (.2) REVIEW RESPONSIVE EMAIL FROM TOLLED PARTY COUNSEL (.1)	0.30
12/24/20	SAWYER	FACILITATE EXECUTION OF EXTENSION TO TOLLING AGREEMENT	0.50
12/28/20	BEVILLE	REVIEW PROPOSED REVISIONS TO PEARSON SETTLEMENT AGREEMENT	0.10
12/28/20	SAWYER	CORRESPONDENCE WITH DGC RE DEFAULT VENDOR MOTIONS (.2); FACILITATE EXECUTION OF EXTENSION TO TOLLING AGREEMENT RE VENDOR AVOIDANCE ACTIONS (.2); ATTENTION TO VARIOUS OPEN ITEMS AND RELATED CORRESPONDENCE RE VENDOR AVOIDANCE ACTIONS (1.5)	1.90
12/28/20	AXELROD	EMAILS WITH PEARSON AND ORACLE RE SETTLEMENT AGREEMENT ITEMS (.5); REVIEW CASE UPDATES (.2); EMAILS WITH WORKING GROUP RE VARIOUS VENDOR ACTION ITEMS (.2)	0.90
12/29/20	RINNE	ANALYZE AND UPDATE DEFAULT DEFENDANT CASE FILES AND TRACKER	0.20
12/29/20	SAWYER	FACILITATE EXECUTION OF TOLLING AGREEMENT (.5); ATTENTION TO VARIOUS OPEN ITEMS AND RELATED CORRESPONDENCE RE VENDOR AVOIDANCE ACTIONS (.9)	1.40
12/30/20	SAWYER	CORRESPONDENCE WITH DGC AND LOCAL COUNSEL RE DILIGENCE ITEMS IN VENDOR AVOIDANCE ACTIONS (.2); ANALYZE DOCUMENTS PERTAINING TO PAYMENTS MADE TO VENDOR RE SAME (1.0)	1.20
12/31/20	SAWYER	CALL WITH LOCAL COUNSEL RE ANALYSIS OF INFORMATION PERTAINING TO VENDOR AVOIDANCE ACTIONS	0.50
<b>Total Hours</b>			<b>183.70</b>





PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
January 5, 2021

Invoice 6910933  
Page 19

TIME SUMMARY

Professional	Hours		Rate	Value
SUNNI P. BEVILLE	3.00	hours at	790.00	2,370.00
BLAIR M. RINNE	35.40	hours at	790.00	27,966.00
CATHRINE M. CASTALDI	0.30	hours at	790.00	237.00
TRISTAN G. AXELROD	33.90	hours at	790.00	26,781.00
ALEXANDRA M. DEERING	10.60	hours at	270.00	2,862.00
MATTHEW A. SAWYER	100.30	hours at	790.00	79,237.00
ELIZABETH G. HOSANG	0.20	hours at	270.00	54.00
Total Fees				139,507.00

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175



**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6910933  
Date Jan 5, 2021  
Client 035179

RE: THIRD PARTY CLAIMS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through December 31, 2020:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0017	THIRD PARTY CLAIMS	1,896.00	0.00	1,896.00
<b>Total</b>		<b>1,896.00</b>	<b>0.00</b>	<b>1,896.00</b>

Total Current Fees \$1,896.00

Total Current Costs \$0.00

**Total Invoice \$1,896.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
January 5, 2021  
Invoice 6910933  
Page 21

RE: THIRD PARTY CLAIMS

TIME DETAIL

Date	Professional	Description	Hours
12/16/20	RINNE	STRATEGIZE WITH M. SAWYER AND T. AXELROD REGARDING ENDING TOLLING AGREEMENT WITH TOLLED PARTY (.1); UPDATING C. CASTALDI REGARDING SAME (.2)	0.30
12/18/20	RINNE	STRATEGIZE WITH M. SAWYER REGARDING NEW AMENDMENT TO TOLLING AGREEMENT WITH TOLLED PARTY (.2); ANALYZE THIRD AMENDMENT TO TOLLING AGREEMENT FOR TOLLED PARTY AND DRAFT NEW AMENDMENT (.4)	0.60
12/19/20	RINNE	DRAFT TOLLING AGREEMENT AMENDMENT WITH RESPECT TO TOLLED PARTY AVOIDANCE ACTION CLAIMS	0.30
12/20/20	RINNE	CORRESPOND WITH M. SAWYER REGARDING TOLLING AGREEMENT AMENDMENT WITH RESPECT TO TOLLED PARTY AVOIDANCE ACTION CLAIMS	0.20
12/21/20	RINNE	CORRESPOND WITH M. SAWYER REGARDING TOLLING AGREEMENT AMENDMENT WITH RESPECT TO TOLLED PARTY AVOIDANCE ACTION CLAIMS (.1); CORRESPOND WITH TOLLED PARTY'S COUNSEL AND C. CASTALDI REGARDING SAME (.2); UPDATING TOLLING AGREEMENT TRACKER (.2)	0.50
12/23/20	RINNE	CORRESPOND WITH TOLLED PARTY'S COUNSEL REGARDING TOLLING AGREEMENT EXTENSION (.1); STRATEGIZE WITH C. CASTALDI REGARDING SAME (.1)	0.20
12/28/20	RINNE	ANALYZE PARTIALLY EXECUTED TOLLING AGREEMENT AND RELATED CORRESPONDENCE	0.10
12/29/20	RINNE	ANALYZE FULLY-EXECUTED TOLLING AGREEMENT WITH TOLLED PARTY	0.20
<b>Total Hours</b>			<b>2.40</b>

TIME SUMMARY

Professional	Hours	Rate	Value
BLAIR M. RINNE	2.40 hours at	790.00	1,896.00
<b>Total Fees</b>			<b>1,896.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6910933
Date	Jan 5, 2021
Client	035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

**Remittance** 

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**Balance Due: \$145,601.00**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**PRINCIPAL CERTIFICATION**

I hereby authorize the submission of this Twenty-Fifth Monthly Fee Statement for Brown Rudnick LLP covering the period from December 1, 2020 through December 31, 2020.



---

Jaime A. El Koury  
General Counsel to the Financial Oversight  
and Management Board for Puerto Rico

**EXHIBIT G-4**

**TWENTY-SIXTH MONTHLY FEE STATEMENT  
(JANUARY 1, 2021 THROUGH JANUARY 31, 2021)**

64001600 v2

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

*In re:*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III  
Case No. 17-BK-3283 (LTS)

(Jointly Administered)

**TWENTY-SIXTH MONTHLY FEE STATEMENT OF BROWN RUDNICK LLP,  
CLAIMS COUNSEL FOR THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
FOR SERVICES AND DISBURSEMENTS FOR THE PERIOD OF  
JANUARY 1, 2021 THROUGH JANUARY 31, 2021**

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Commonwealth of Puerto Rico, *et al.*

March 5, 2021

FOR PROFESSIONAL SERVICES AND DISBURSEMENTS

Client Ref. No. 35179

Invoice Nos. 6914210 and 6914211

Re: The Financial Oversight and Management Board for Puerto Rico,  
as representative of The Commonwealth of Puerto Rico, *et al.*  
Debtors under Title III  
January 1, 2021 – January 31, 2021

Professional services rendered by Brown Rudnick LLP,  
Claims Counsel for The Financial Oversight and Management Board for Puerto Rico, acting  
through its Special Claims Committee

**Total Amount of Compensation for Professional Services** **\$119,910.00**

Less Holdback as per Court Order dated June 6, 2018 [Docket No. 3269] (10%)	\$11,991.00
Interim Compensation for Professional Services (90%)	\$107,919.00
Plus Reimbursement for Actual and Necessary Expenses	\$186.60
Total Requested Payment Less Holdback <sup>2</sup>	<b>\$108,105.60</b>

<sup>2</sup> Brown Rudnick LLP reserves the right to include a gross-up amount in its interim fee application relating to any professional fee tax that is imposed on Brown Rudnick LLP. Brown Rudnick will endeavor to make any such gross-up consistent with the discussion reflected at the hearing conducted by Judge Swain on December 19, 2018 addressing the fee examiner's proposed additional presumptive standards and with any recommendation made by the fee examiner and as may be approved by the Court.

**FEE STATEMENT INDEX**

<b>Exhibit A</b>	<b>Summary of Fees and Costs by Task Code</b>
<b>Exhibit B</b>	<b>Summary of Hours and Fees by Professional</b>
<b>Exhibit C</b>	<b>Summary of Costs</b>
<b>Exhibit D</b>	<b>Time Entries for Each Professional by Task Code (Invoices)</b>



**EXHIBIT A**

<b><u>Task Code</u></b>	<b><u>Hours</u></b>	<b><u>Fees</u></b>	<b><u>Costs</u></b>	<b><u>Total Amount</u></b>
General /Costs Only	0.0	\$0.00	\$186.60	\$186.60
Meetings and Communications with Client	3.0	\$2,370.00	\$0.00	\$2,370.00
Fee Applications	21.2	\$6,140.00	\$0.00	\$6,140.00
General Investigation	1.3	\$1,027.00	\$0.00	\$1,027.00
Avoidance Actions	140.2	\$109,978.00	\$0.00	\$109,978.00
Third Party Claims	.5	\$395.00	\$0.00	\$395.00
<b>TOTAL</b>	<b>200.3</b>	<b>\$119,910.00</b>	<b>\$186.60</b>	<b>\$120,096.60</b>

**EXHIBIT B**

**SERVICES RENDERED BY  
BROWN RUDNICK LLP**

**COMMENCING JANUARY 1, 2021 THROUGH JANUARY 31, 2021**

**TIME AND COMPENSATION BREAKDOWN**

<b>Partners and Of Counsel</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Sunni P. Beville	Partner; Admitted to Massachusetts Bar in 2002; Restructuring	\$790.00	2.5	\$1,975.00
<b>TOTAL</b>			<b>2.5</b>	<b>\$1,975.00</b>

<b>Associates</b>	<b>Position; Year(s) Admitted to Bar; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Tristan G. Axelrod	Associate; Admitted to Massachusetts Bar in 2014; Restructuring	\$790.00	34.1	\$26,939.00
Blair Rinne	Associate; Admitted to Massachusetts Bar in 2014; Litigation	\$790.00	9.4	\$7,426.00
Matthew Sawyer	Associate; Admitted to Massachusetts Bar in 2019; Restructuring	\$790.00	98.3	\$77,657.00
<b>TOTAL</b>			<b>141.8</b>	<b>\$112,022.00</b>

<b>Paralegals and Other Professionals</b>	<b>Position; Specialty</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Harriet E. Cohen	N/A; Paralegal with over 30 years' experience; Restructuring	\$270.00	20.4	\$5,508.00
Alexandra M. Deering	N/A; Paralegal with over 5 years' experience; Restructuring	\$270.00	1.5	\$405.00
<b>TOTAL</b>			<b>21.9</b>	<b>\$5,913.00</b>
<b>GRAND TOTAL</b>			<b>166.2</b>	<b>\$119,910.00</b>

**EXHIBIT C**

**ACTUAL AND NECESSARY COSTS INCURRED BY  
BROWN RUDNICK LLP COMMENCING  
JANUARY 1, 2021 THROUGH JANUARY 31, 2021**

<u>Service</u>	<u>Cost</u>
Copies (B&W @ 10 cents per page)	\$1.40
Pacer	\$121.20
Westlaw	\$64.00
<b>TOTAL</b>	<b>\$186.60</b>

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PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914210  
Date Mar 5, 2021  
Client 035179

RE: COSTS

INVOICE

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

Matter No.	Matter Name	Fees	Costs	Total
035179.0001	COSTS	0.00	186.60	186.60
<b>Total</b>		<b>0.00</b>	<b>186.60</b>	<b>186.60</b>

Total Current Fees	\$0.00
Total Current Costs	\$186.60
<b>Total Invoice</b>	<b>\$186.60</b>



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
 RE: COSTS  
 March 5, 2021

Invoice 6914210  
 Page 2

#### COST DETAIL

Date	Description	Value
01/01/21	PACER	6.00
01/01/21	PACER	2.00
01/01/21	PACER	49.20
01/01/21	PACER	3.70
01/01/21	PACER	14.00
01/01/21	PACER	43.70
01/01/21	PACER	2.60
01/13/21	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
01/13/21	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	15.00
01/19/21	DOCUMENT PRODUCTION	0.00
01/20/21	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	2.00
01/20/21	WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	45.00
01/28/21	COPIES	0.40
01/28/21	COPIES	0.10
01/28/21	COPIES	0.10
01/28/21	COPIES	0.40
01/28/21	COPIES	0.10
01/28/21	COPIES	0.10
01/28/21	COPIES	0.10
01/28/21	COPIES	0.10
01/28/21	COPIES	0.10
<b>Total Costs</b>		<b>186.60</b>

#### COST SUMMARY

Description	Value
DOCUMENT PRODUCTION	0.00
WESTLAW ONLINE TRANSACTIONAL SEARCHES / DOCS	64.00
PACER	121.20
COPIES	1.40
<b>Total Costs</b>	<b>186.60</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
 KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
 PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6914210
Date	Mar 5, 2021
Client	035179

RE: COSTS

**Remittance** 

---

**Balance Due: \$186.60**

---

To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594



**EXHIBIT D**

**Time Entries for Each Professional By Task Code (Invoice)**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914211  
Date Mar 5, 2021  
Client 035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

## INVOICE

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

Matter No.	Matter Name	Fees	Costs	Total
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	2,370.00	0.00	2,370.00
035179.0004	FEE APPLICATIONS	6,140.00	0.00	6,140.00
035179.0006	GENERAL INVESTIGATION	1,027.00	0.00	1,027.00
035179.0015	AVOIDANCE ACTIONS	109,978.00	0.00	109,978.00
035179.0017	THIRD PARTY CLAIMS	395.00	0.00	395.00
<b>Total</b>		<b>119,910.00</b>	<b>0.00</b>	<b>119,910.00</b>

Total Current Fees \$119,910.00

Total Current Costs \$0.00

**Total Invoice \$119,910.00**

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914211  
Date Mar 5, 2021  
Client 035179

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0003	MEETINGS AND COMMUNICATIONS WITH CLIENT	2,370.00	0.00	2,370.00
<b>Total</b>		<b>2,370.00</b>	<b>0.00</b>	<b>2,370.00</b>

Total Current Fees \$2,370.00

Total Current Costs \$0.00

**Total Invoice \$2,370.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021  
Invoice 6914211  
Page 3

RE: MEETINGS AND COMMUNICATIONS WITH CLIENT

TIME DETAIL

Date	Professional	Description	Hours
01/06/21	BEVILLE	TELEPHONE CONFERENCE WITH J. EL KOURY REGARDING RE-APPOINTMENT OF SPECIAL CLAIMS COMMITTEE MEMBERS (.2); REVIEW/REVISE DRAFT RESOLUTION REGARDING SAME (.3)	0.50
01/06/21	SAWYER	DRAFT UNANIMOUS WRITTEN CONSENT OF RE-APPOINTMENT OF SCC MEMBERS	0.60
01/06/21	AXELROD	DRAFT AND REVISE UNANIMOUS FOMB CONSENT RE SCC MEMBERSHIP	0.90
01/11/21	BEVILLE	CORRESPONDENCE REGARDING SCC MEETING	0.10
01/13/21	AXELROD	CALL WITH UCC	0.70
01/19/21	BEVILLE	CORRESPONDENCE REGARDING SCC CALL	0.20
<b>Total Hours</b>			<b>3.00</b>

TIME SUMMARY

Professional	Hours	Rate	Value
SUNNI P. BEVILLE	0.80 hours at	790.00	632.00
TRISTAN G. AXELROD	1.60 hours at	790.00	1,264.00
MATTHEW A. SAWYER	0.60 hours at	790.00	474.00
<b>Total Fees</b>			<b>2,370.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914211  
Date Mar 5, 2021  
Client 035179

RE: FEE APPLICATIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0004	FEE APPLICATIONS	6,140.00	0.00	6,140.00
<b>Total</b>		<b>6,140.00</b>	<b>0.00</b>	<b>6,140.00</b>

Total Current Fees \$6,140.00

Total Current Costs \$0.00

**Total Invoice \$6,140.00**



RE: FEE APPLICATIONS

TIME DETAIL

Date	Professional	Description	Hours
12/03/20	SAWYER	CALL WITH G. WILLARD RE INTERIM FEE APPLICATIONS (.4); CORRESPONDENCE WITH BRG RE SAME (.4)	0.80
01/04/21	COHEN	EMAILS WITH C. BURKE (.2); SUBMIT DGC NOVEMBER FEE STATEMENTS TO J. EL KOURY FOR PRINCIPAL CERTIFICATION (.2); SUBMIT DGC TITLE III NO OBJECTION STATEMENTS FOR OCTOBER (.3); SUBMIT DGC NOVEMBER FEE STATEMENTS PURSUANT TO COMPENSATION PROCEDURES (.3); DRAFT BROWN RUDNICK TITLE III NO OBJECTION STATEMENTS FOR NOVEMBER AND SUBMIT ACCORDINGLY (.5); STRATEGIZE REGARDING BUDGETS (.2)	1.20
01/05/21	COHEN	WORK ON BROWN RUDNICK MONTHLY FEE STATEMENTS AND ISSUES RELATED THERETO; REVIEW OF BUDGET INFO AND EMAILS	1.10
01/06/21	COHEN	FINALIZE DECEMBER FEE STATEMENTS AND EMAILS TO J. EL KOURY REGARDING PRINCIPAL CERTIFICATION (1.6); SUBMIT FEE STATEMENTS PURSUANT TO FEE ORDER (.2)	1.80
01/07/21	COHEN	REVIEW I. CARDONA STATEMENTS AND PREPARE FOR PRINCIPAL CERTIFICATION	0.20
01/08/21	COHEN	SEND CARDONA MONTHLY FEE STATEMENTS TO J. EL KOURY (.2); COMPILE DATA FOR INTERIM FEE APPLICATIONS (.4)	0.60
01/11/21	COHEN	SUBMIT CARDONA DECEMBER MONTHLY FEE STATEMENTS PURSUANT TO FEE PROCEDURES ORDER	0.20
01/14/21	COHEN	NUMEROUS EMAILS WITH C. BURKE, V. BLAY SOLER REGARDING FEE ISSUES, WAIVERS FOR 2021 AND ATTENTION TO SAME	0.40
01/15/21	COHEN	EMAILS AND STRATEGIZE REGARDING VARIOUS FEE RELATED ISSUES, BUDGETS AND NECESSARY PROCEDURES	0.90
01/19/21	COHEN	FINALIZE AND SUBMIT BROWN RUDNICK TITLE III NO OBJECTION STATEMENTS FOR DECEMBER 2020 (.5); SEND DGC DECEMBER FEE STATEMENTS TO J. EL KOURY FOR PRINCIPAL CERTIFICATION (.2); EMAILS WITH V. BLAY SOLER AND OTHERS AND INQUIRE REGARDING HACIENDA AND GOVERNMENT WEBSITE FOR TAX DATA (.6)	1.30
01/20/21	COHEN	STRATEGIZE REGARDING MONTHLY FEE STATEMENTS AND INTERIM FEE APPLICATIONS (.4); SUBMIT DGC MONTHLY FEE STATEMENTS FOR DECEMBER (.2)	0.60



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021  
Invoice 6914211  
Page 6

Date	Professional	Description	Hours
01/21/21	COHEN	EMAILS WITH I. CARDONA (.2); STRATEGIZE REGARDING INTERIM APPLICATIONS (.3); REVIEW DATA REGARDING BUDGET SUBMISSIONS (.2)	0.70
01/22/21	COHEN	COMPILE DATA AND STRATEGIZE REGARDING SUPPLEMENTAL INFORMATION (.3); SUBMIT BROWN RUDNICK AND DICICCO GULMAN BUDGETS (.1); WORK ON INTERIM FEE APPLICATIONS (.8)	1.20
01/25/21	COHEN	WORK ON BUDGET COMPILATION FOR INTERIM FEE PERIODS (.5); REVIEW AND WORK TO FINALIZE FEE APPLICATIONS AND NOTICES (.8)	1.30
01/26/21	COHEN	WORK ON INTERIM FEE APPLICATIONS AND EXHIBITS AND SCHEDULES TO SAME FOR NINTH INTERIM PERIOD	1.60
01/27/21	COHEN	NUMEROUS EMAILS WITH V. BLAY SOLER AND I. CARDONA (.3); FINALIZE NINTH INTERIM FEE APPLICATION, EXHIBITS AND SCHEDULES, DRAFT NOTICES; CONTACT PRIME CLERK TEAM REGARDING SERVICE, EFFECTUATE FILING OF SAME	2.30
01/28/21	COHEN	NUMEROUS EMAILS REGARDING FEE ISSUES (.3); REVIEW LEDES FILES (.2); WORK ON COMPARATIVE BUDGET DATA FOR TENTH INTERIM FEE PERIOD AND DRAFT APPLICATIONS FOR SAME (2.9)	3.40
01/29/21	COHEN	WORK ON DRAFT TENTH INTERIM FEE APPLICATIONS; COMPILATION OF DATA AND PREPARATION OF EXHIBITS AND SCHEDULES	1.60
<b>Total Hours</b>			<b>21.20</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
HARRIET E. COHEN	20.40 hours at	270.00	5,508.00
MATTHEW A. SAWYER	0.80 hours at	790.00	632.00
<b>Total Fees</b>			<b>6,140.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914211  
Date Mar 5, 2021  
Client 035179

RE: GENERAL INVESTIGATION

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0006	GENERAL INVESTIGATION	1,027.00	0.00	1,027.00
<b>Total</b>		<b>1,027.00</b>	<b>0.00</b>	<b>1,027.00</b>

Total Current Fees \$1,027.00

Total Current Costs \$0.00

**Total Invoice \$1,027.00**





PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL  
CLAIMS COMMITTEE  
March 5, 2021

Invoice 6914211  
Page 8

RE: GENERAL INVESTIGATION

TIME DETAIL

Date	Professional	Description	Hours
01/11/21	AXELROD	REVIEW BRIEFS RE AMBAC PROMESA CONSTITUTIONALITY CHALLENGE	1.10
01/12/21	AXELROD	REVIEW SUMMARY OF ORAL ARGUMENT RE PROMESA CONSTITUTIONALITY	0.20
Total Hours			1.30

TIME SUMMARY

Professional	Hours	Rate	Value
TRISTAN G. AXELROD	1.30 hours at	790.00	1,027.00
Total Fees			1,027.00

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914211  
Date Mar 5, 2021  
Client 035179

RE: AVOIDANCE ACTIONS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0015	AVOIDANCE ACTIONS	109,978.00	0.00	109,978.00
<b>Total</b>		<b>109,978.00</b>	<b>0.00</b>	<b>109,978.00</b>

Total Current Fees \$109,978.00

Total Current Costs \$0.00

**Total Invoice \$109,978.00**



RE: AVOIDANCE ACTIONS

TIME DETAIL

Date	Professional	Description	Hours
12/01/20	AXELROD	CALLS WITH DGC AND ESTRELLA RE TOLLED PARTY	0.80
01/03/21	RINNE	ANALYZE ANSWERS FILED BY TOLLING PARTIES GENERAL CONTRACTORS (.5); ANALYZE FEDERAL RULES OF CIVIL PROCEDURE REGARDING DISCLOSURES AND SCHEDULING DEADLINES TO DETERMINE NEXT STEPS IN ADVERSARY PROCEEDINGS WITH FILED ANSWERS (.5)	1.00
01/03/21	SAWYER	CORRESPONDENCE WITH DGC RE PREFERENCE ANALYSIS	0.20
01/03/21	AXELROD	EMAILS WITH B. RINNE RE ACTIVE ADVERSARY PROCEEDINGS	0.20
01/04/21	RINNE	STRATEGIZE WITH T. AXELROD REGARDING TOLLING PARTIES LITIGATION MATTERS (.2); CORRESPOND WITH ESTRELLA AND DGC REGARDING DISCOVERY REQUESTS AND SAME (.3)	0.50
01/04/21	SAWYER	CALL WITH B. WEXLER RE OUTSTANDING PREFERENCE ACTION ITEMS (.8); DRAFT PREFERENCE RECOMMENDATIONS (1.6)	2.40
01/04/21	AXELROD	CALL WITH M. SAWYER RE OUTSTANDING ITEMS (.1); CALL WITH B. RINNE RE TOLLING PARTIES (.2); REVIEW CASE UPDATES (.2)	0.50
01/05/21	SAWYER	DRAFT PREFERENCE RECOMMENDATIONS RE VENDOR AVOIDANCE ACTIONS AND RELATED COMMUNICATION WITH T. AXELROD AND B. WEXLER (4.1); REVIEW DEFAULT VENDOR DOCKETS FOR RESPONSES TO MOTION FOR DEFAULT JUDGMENT (.2); CORRESPONDENCE WITH DGC RE DILIGENCE ITEMS FOR FT CLAIMS RE VENDOR ACTIONS (.2)	4.50
01/05/21	RINNE	ANALYZE COMPTROLLER CERTIFICATES AND DRAFTS NEEDED FOR NEXT DEFAULT JUDGMENT MOTIONS (.4); CORRESPOND WITH K. SURIA AND M. SAWYER REGARDING COMPTROLLER CERTIFICATE TRANSLATIONS AND DRAFTS NEEDED (.4)	0.80
01/05/21	AXELROD	EMAILS WITH UCC, WORKING GROUP	0.80
01/06/21	RINNE	ANALYZE EXHIBITS FOR NEXT DEFAULT JUDGMENT MOTION AND COORDINATE COMPILATION OF ADDITIONAL NEEDED DOCUMENTS	0.20
01/06/21	SAWYER	ANALYZE VENDOR CONTRACTS RE PREFERENCE SETTLEMENT NEGOTIATIONS (.9); CORRESPONDENCE WITH DGC RE SAME (.2); DRAFT LETTER TO VENDOR'S COUNSEL RE INFORMATION REQUEST (.9); DRAFT AND CIRCULATE PROPOSED AGENDA FOR 1/7 MEETING WITH TEAM AND DGC (.6)	2.60
01/06/21	AXELROD	EMAILS WITH UCC, WORKING GROUP RE AVOIDANCE ACTION ISSUES	0.70



Date	Professional	Description	Hours
01/07/21	RINNE	ANALYZE TRANSLATION FROM LOCAL COUNSEL AND COORDINATE EXHIBIT FOR DEFAULT JUDGMENT MOTION (.6); WEEKLY MEETING WITH DGC REGARDING STATUS OF CASES (.3)	0.90
01/07/21	SAWYER	MEETING WITH TEAM AND DGC RE ACTION ITEMS ON VENDOR AVOIDANCE ACTIONS (1.0); CALL WITH B. WEXLER RE PREFERENCE VENDOR UPDATES (.2); CORRESPONDENCE WITH VENDOR'S COUNSEL RE DILIGENCE ITEMS (.3); CORRESPONDENCE WITH DGC RE REQUESTS TO AFFAF FOR INFORMATION PERTAINING TO VENDOR ACTIONS (.1); CORRESPONDENCE WITH AFFAF RE SAME (.2); DRAFT RECOMMENDATION MEMOS RE VENDOR ACTIONS (1.3)	3.10
01/07/21	AXELROD	CATCHUP CALL WITH DGC (1.0); RESPOND TO EMAILS RE VENDOR LITIGATION MATTERS, SCHEDULING (.4)	1.40
01/08/21	RINNE	ANALYZE AND APPROVE EXHIBITS FOR NEXT DEFAULT JUDGMENT MOTIONS (.2); CORRESPOND WITH M. SAWYER AND J. KNOTT REGARDING SAME (.2)	0.40
01/08/21	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR ACTIONS AND RELATED CORRESPONDENCE WITH DGC RE SAME (.7); SEND SAME TO UCC COUNSELS FOR REVIEW (.2); CORRESPONDENCE WITH C. INFANTE RE OUTSTANDING ACTION ITEMS RE VENDOR ACTIONS (.2); DRAFT MOTION FOR DEFAULT JUDGMENT (1.6)	2.70
01/08/21	AXELROD	EMAILS WITH PREFERENCE DEFENDANTS, WORKING GROUP RE SETTLEMENT ISSUES (.8); REVIEW CONTRACTS RE PREF DEFENSE ISSUES (.2)	1.00
01/11/21	SAWYER	DRAFT AND FINALIZE PREFERENCE RECOMMENDATION MEMOS RE VENDOR ACTIONS (3.8); SEND SAME TO UCC COUNSELS FOR REVIEW (.3); CALL WITH T. AXELROD RE OUTSTANDING VENDOR ITEMS (.3); CALL WITH B. WEXLER RE PREFERENCE DILIGENCE ITEMS (.6)	5.00
01/11/21	AXELROD	REVIEW EMAILS WITH UHY RE BDO PROPOSAL AND SEND INQUIRY TO J. REAGAN (.5); REVIEW AND COMMENT RE PREFERENCE RECOMMENDATIONS (.5)	1.00
01/12/21	SAWYER	ANALYZE DILIGENCE MATERIAL FROM DGC IN ADVANCE OF CALL WITH UCC (.6); DRAFT PREFERENCE RECOMMENDATION MEMOS RE VENDOR ACTIONS AND RELATED CORRESPONDENCE WITH B. WEXLER (1.6); DRAFT EMAIL TO DOE RE PRODUCTION OF CONTRACTS (.4)	2.60
01/12/21	AXELROD	DRAFT EMAIL TO UCC RE INQUIRIES RE OPEN PREFERENCE ACTIONS	0.70
01/13/21	RINNE	ANALYZE AND APPROVE EXHIBITS FOR NEXT DEFAULT JUDGMENT MOTIONS (.4); CORRESPOND WITH M. SAWYER AND J. KNOTT REGARDING SAME (.1)	0.50



Date	Professional	Description	Hours
01/13/21	AXELROD	EMAILS RE PREFERENCE ISSUES, PREP FOR UCC CALL (.6); PREP CALL WITH R. WEXLER RE ESC (.3); FINALIZE ESCROW AGMT WITH FOMB ETC (.5); REVIEW CASE UPDATES AND DOCKET (.3); REVIEW AGENDA FOR UCC CALL (.2); PREP FOR CALL WITH ESTRELLA (.2); CALL WITH ESTRELLA (.6); FOLLOWUP REVIEW RE TOLLED PARTY (.2); SETTLEMENT CALL WITH ESC (.5); CALL WITH R. WEXLER RE TOLLED PARTIES, RELATED ISSUES (.6)	4.00
01/13/21	SAWYER	ATTENTION TO VARIOUS PREFERENCE VENDOR MATTERS INCLUDING ANALYSIS OF CASE LAW (2.0), PREPARE FOR SETTLEMENT NEGOTIATIONS (.5); SETTLEMENT NEGOTIATIONS WITH VENDOR'S COUNSEL (.5), RELATED CORRESPONDENCE WITH T. AXELROD AND B. WEXLER (.8); ATTENTION TO VARIOUS VENDOR ITEMS INCLUDING CALL WITH T. AXELROD AND UCC COUNSEL RE VENDOR AVOIDANCE ACTION RECOMMENDATIONS (.9); CALL WITH C. INFANTE AND T. AXELROD RE OUTSTANDING DILIGENCE ITEMS (.6); PREPARE AGENDA FOR 1/14 CALL WITH S. BEVILLE AND T. AXELROD (.5); PREPARE AGENDA FOR 1/14 MEETING WITH TEAM AND DGC (.6); ATTENTION TO VARIOUS DEFAULT VENDOR ITEMS INCLUDING CALL WITH B. RINNE RE STATUS UPDATE (.6) AND REVIEW OF DOCKET RE CASE STATUS AND NEXT STEPS (.4)	7.40
01/14/21	BEVILLE	STRATEGIZE REGARDING PREFERENCE ACTIONS AND NEXT STEPS TO MOVE CASES FORWARD	1.10
01/14/21	SAWYER	DRAFT MOTION FOR DEFAULT JUDGMENT PAPERS RE VENDOR ACTIONS (1.5); MEETING WITH DGC RE OUTSTANDING ACTION ITEMS IN VENDOR CASES (1.0); SUMMARIZE NOTES AND ACTION ITEMS FROM MEETING FOR TEAM (.6); PREPARE FOR PREFERENCE SETTLEMENT CALL WITH VENDOR'S COUNSEL (.2); CALL RE SAME (.2); FINALIZE PREFERENCE RECOMMENDATION MEMOS AND SEND TO UCC FOR REVIEW (.6); CALL WITH S. BEVILLE AND T. AXELROD RE CASE STATUS UPDATE (.9); CALL WITH T. DONAHOE RE BID AWARD VENDORS (.6); CORRESPONDENCE WITH T. AXELROD RE SAME (.5)	6.10
01/14/21	RINNE	ANALYZE DRAFT DEFAULT JUDGMENT MOTION (.1); CORRESPOND WITH M. SAWYER REGARDING SAME (.1); ANALYZE UPDATE AND NEXT STEPS FROM DGC WEEKLY CALL AND CORRESPOND REGARDING SAME (.2)	0.40
01/14/21	AXELROD	EMAILS WITH R. WEXLER AND TEAM RE SCHEDULING (.1); EMAILS WITH UCC RE ESCROW AGREEMENT (.3); CALL WITH TOLLED PARTY RE PREF SETTLEMENT (.4); CATCHUP CALL WITH S. BEVILLE, M. SAWYER RE OUTSTANDING AVOIDANCE ACTION ISSUES (.9); FOLLOWUP CALL WITH M. SAWYER RE SAME (.1); EMAILS TO WORKING GROUP RE NEXT STEPS (.4)	2.20
01/15/21	BEVILLE	CORRESPONDENCE TO CLIENT REGARDING SETTLEMENT RECOMMENDATIONS	0.30



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021

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Date	Professional	Description	Hours
01/15/21	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR ACTIONS (1.8); CALL WITH T. AXELROD RE BID VENDOR ANALYSIS (.2); CORRESPONDENCE WITH TEAM AND UCC RE PREFERENCE SETTLEMENT AND DRAFT SETTLEMENT RECOMMENDATION TO SCC RE SAME (.5); REVISE AGREEMENT RE PROCEEDS FROM ADVERSARY PROCEEDINGS WITH UCC AND RELATED CORRESPONDENCE (.3); CORRESPONDENCE WITH VENDOR'S COUNSEL RE DILIGENCE ITEMS TO PRODUCE (.2); DRAFT BID AWARD MEMO AND CIRCULATE TO T. AXELROD FOR REVIEW (1.8)	4.80
01/15/21	AXELROD	STRATEGIZE RE BID VENDOR MEMO (.4); DRAFT SETTLEMENT DOCS RE TOLLED PARTY (.4); REVISE ESCROW AGREEMENT WITH TOLLED PARTY (1.0); DISCUSS SAME WITH J. ELKOURY AND SOLICIT SCC APPROVAL (.9)	2.70
01/18/21	RINNE	ANALYZE AND REVISE MOTION FOR DEFAULT JUDGMENT REGARDING TOLLED PARTY	1.80
01/18/21	SAWYER	CONTINUE DRAFT AND REVISIONS OF BID VENDOR MEMO (1.1); ATTENTION TO PREFERENCE SETTLEMENT RECOMMENDATIONS AND RELATED CORRESPONDENCE BY UCC COUNSELS (1.2)	2.30
01/18/21	AXELROD	REVIEW AND REVISE BID AWARD MEMO (.6); CALL WITH J. ELKOURY RE UHY/BDO PR (.2); EMAILS WITH CLIENT AND UCC AND NEGOTIATE BPPR ESCROW AGREEMENT (1.4)	2.20
01/19/21	BEVILLE	CORRESPONDENCE REGARDING NEED FOR TOLLING EXTENSION (.1); REVIEW DRAFT DEFAULT MOTION PLEADINGS FOR VENDOR ACTION (.2)	0.30
01/19/21	RINNE	ANALYZE EDITS AND CORRESPONDENCE FROM UCC COUNSEL TO DEFAULT JUDGMENT MOTION REGARDING TOLLED PARTY (.4); STRATEGIZE WITH M. SAWYER REGARDING NEXT FILING (.2); ANALYZE INFORMATION NEEDED FROM DGC REGARDING TOLLED PARTY AND CORRESPOND WITH ESTRELLA REGARDING SAME (.2)	0.80
01/19/21	SAWYER	REVISIONS TO MOTION FOR DEFAULT JUDGMENT PAPERS AND RELATED CORRESPONDENCE WITH UCC COUNSEL (1.1); DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND RELATED CORRESPONDENCE WITH DGC (5.8); CONTINUE DRAFT AND REVISIONS TO BID AWARD MEMO (.5); CALL WITH C. INFANTE AND T. DONAHOE RE BID AWARD PROCESS AND FOLLOW-UP CORRESPONDENCE RE SAME (1.2)	8.60
01/19/21	AXELROD	REVIEW AND RESPOND TO EMAILS RE PREFERENCE DILIGENCE ISSUES (.3); DRAFT AND CIRCULATE SCC RESOLUTION RE ESCROW (.5); EMAILS WITH ORACLE RE PAYMENT ISSUES (.2); REVIEW AND COMMENT RE DEFAULT JUDGMENT PAPERS (.2)	1.20



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021

Invoice 6914211  
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Date	Professional	Description	Hours
01/20/21	RINNE	ANALYZE EDITS AND CORRESPONDENCE FROM UCC COUNSEL TO DEFAULT JUDGMENT MOTION REGARDING TOLLED PARTY (.4); STRATEGIZE WITH M. SAWYER REGARDING NEXT FILING (.2)	0.60
01/20/21	SAWYER	DRAFT MEMO RE VENDOR'S PREFERENCE DEFENSE AND RELATED RESEARCH (3.0); ATTENTION TO RECOMMENDATION MEMOS RE VENDOR ACTIONS INCLUDING CONTINUE DRAFT AND REVISIONS AND RELATED CORRESPONDENCE WITH DGC (2.4); DRAFT AND CIRCULATE AGENDA FOR WEEKLY TEAM MEETING (.4); REVIEW VENDOR BANKRUPTCY DOCKET FOR CASE STATUS UPDATE (.2)	6.00
01/21/21	RINNE	WEEKLY MEETING WITH DGC REGARDING STATUS OF DEFAULT DEFENDANTS AND OTHER AVOIDANCE ACTIONS	0.30
01/21/21	SAWYER	REVISE AND CIRCULATE AGENDA FOR MEETING WITH DGC AND TEAM (.4); REVISE PREFERENCE DEFENSE MEMO TO INCLUDE CERTAIN CASE EXAMPLES (2.9); MEETING WITH DGC AND TEAM RE OUTSTANDING VENDOR ITEMS (.6); CALL WITH COUNSEL TO AAFAF RE REQUESTS FOR INFORMATION TO FACILITATE VENDOR AVOIDANCE ACTION DILIGENCE (.5); NUMEROUS CORRESPONDENCE WITH DGC RE VENDOR AVOIDANCE ACTION ITEMS (.3)	4.70
01/21/21	AXELROD	REVIEW AND COMMENT RE REC MEMOS ON AVOIDANCE DEFENDANTS (.1); WEEKLY STATUS CALL WITH DGC (.6)	0.70
01/22/21	SAWYER	DRAFT RECOMMENDATION MEMO RE VENDOR AVOIDANCE ACTIONS (2.3); ANALYZE DILIGENCE MATERIAL RE VENDOR ACTIONS AND RELATED CORRESPONDENCE WITH DGC (.7)	3.00
01/22/21	AXELROD	REVIEW REPLY TO EMAILS WITH DGC AND TEAM RE PREFERENCE DILIGENCE ITEMS FOR UCC (.5); REVIEW CASE UPDATES AND PREPARE FOR CLIENT MEETING (.5)	1.00
01/23/21	SAWYER	CONTINUE DRAFT RECOMMENDATION MEMOS AND RELATED CORRESPONDENCE WITH DGC (1.3); DRAFT FORMAL REQUEST OF AAFAF RE 1/21 CALL REQUESTING ADDITIONAL INFORMATION PERTAINING TO VENDOR (1.1); RESEARCH PREFERENCE DEFENSE RE VENDOR AVOIDANCE ACTIONS (1.2)	3.60
01/24/21	SAWYER	ANALYZE CASE LAW RE PREFERENCE DEFENSE OF VENDOR AND SUMMARIZE FINDINGS FOR T. AXELROD (1.0); CORRESPONDENCE WITH B. WEXLER RE OPEN ITEMS IN VENDOR CASES (.2)	1.20
01/25/21	SAWYER	SEND REQUEST FOR INFORMATION RE VENDOR TO AAFAF (.2); REVISE RECOMMENDATION MEMOS PER UPDATED DILIGENCE FROM DGC AND RELATED COMMUNICATIONS RE SAME (1.3); CALL WITH B. WEXLER RE OUTSTANDING DILIGENCE ITEMS RE VENDOR AVOIDANCE ACTIONS (1.5)	3.00



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021

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Date	Professional	Description	Hours
01/25/21	AXELROD	EMAILS WITH PEARSON RE SETTLEMENT DOCS (.2); REVIEW REVISE AND EMAILS WITH M. SAWYER RE PREF RECOMMENDATION DRAFTS (.8); REVIEW SHVP SETTLEMENT STATUS AND CALL WITH R. WEXLER RE SAME (.8); CALL WITH SHVP (.6); DRAFT AND SEND SHVP SUMMARY TO UCC (.4)	2.80
01/26/21	SAWYER	DRAFT AND REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND RELATED CORRESPONDENCE WITH DGC AND UCC COUNSELS (4.4); MEETING WITH C. INFANTE AND T. DONAHOE RE SAME (2.0); CALL WITH VENDOR'S COUNSEL RE PREFERENCE DEFENSE AND SETTLEMENT (1.1); CALL WITH T. AXELROD RE VENDOR STATUS UPDATE (.3)	7.80
01/26/21	AXELROD	CALL WITH CLC (.3); CATCHUP WITH M. SAWYER RE SAME (.3); REVIEW HEARING AGENDA AND RELATED RE SCC ITEMS (.2); REVIEW AND COMMENT RE REC MEMOS (.6)	1.40
01/27/21	SAWYER	ATTENTION TO DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND RELATED CORRESPONDENCE WITH TEAM (2.7); CONTINUE DRAFT OF PREFERENCE DEFENSE MEMO (3.7); PREPARE AGENDA FOR CALL WITH UCC (.5)	6.90
01/27/21	AXELROD	REVIEW AND COMMENT RE RECOMMENDATION MEMOS (.5); REVIEW AND RESPOND RE RICOH COMMENTS TO SETTLEMENT AGREEMENT (.2); REVIEW MEMO RE FEDERAL FUNDS (.9)	1.60
01/28/21	RINNE	ANALYZE AND REVISE MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT REGARDING TOLLED PARTY AND COORDINATE UPCOMING FILING (.3); WEEKLY MEETING WITH DGC REGARDING STATUS OF DEFAULT DEFENDANTS AND OTHER AVOIDANCE ACTIONS (.4)	0.70
01/28/21	SAWYER	DRAFT RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS (4.1); SETTLEMENT NEGOTIATION CALL WITH VENDORS COUNSEL (.5); MEETING WITH TEAM AND DGC RE OUTSTANDING VENDOR ACTIONS (1.3); CORRESPONDENCE WITH UCC COUNSEL RE RECOMMENDATIONS (.8)	6.70
01/28/21	AXELROD	RESPOND TO UCC RE PREFERENCE ISSUES (.7); CATCHUP CALL WITH DGC (1.2); PREP FOR CALL WITH MCCS (.2); CALL WITH MCCS (.3); FOLLOWUP CALL WITH R. WEXLER RE MCCS, OTHER PREFERENCE ISSUES (.5)	2.90
01/28/21	DEERING	REVIEW MOTION FOR DEFAULT JUDGMENT RE TOLLED PARTY	0.50
01/29/21	SAWYER	REVISE RECOMMENDATION MEMOS RE VENDOR AVOIDANCE ACTIONS AND SEND TO UCC FOR REVIEW AND APPROVAL	1.70
01/29/21	AXELROD	REVIEW DILIGENCE AND PREP FOR DROGERIA BETANCES CALL (.5); CALL (.5); EMAILS WITH SHVP RE MEETING (.2)	1.20





PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021  
Invoice 6914211  
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Date	Professional	Description	Hours
01/29/21	DEERING	CITE AND REVIEW MEMORANDUM IN SUPPORT OF DEFAULT MOTION RE TOLLED PARTY	1.00
01/31/21	AXELROD	EMAILS WITH DGC, WEXLER RE SCHEDULING	0.20
<b>Total Hours</b>			<b>140.20</b>

#### TIME SUMMARY

Professional	Hours	Rate	Value
SUNNI P. BEVILLE	1.70 hours at	790.00	1,343.00
BLAIR M. RINNE	8.90 hours at	790.00	7,031.00
TRISTAN G. AXELROD	31.20 hours at	790.00	24,648.00
ALEXANDRA M. DEERING	1.50 hours at	270.00	405.00
MATTHEW A. SAWYER	96.90 hours at	790.00	76,551.00
<b>Total Fees</b>			<b>109,978.00</b>

INCLUDES ONLY TIME AND COSTS TO DATE  
KINDLY RETURN ATTACHED REMITTANCE PAGE WITH YOUR PAYMENT  
PAYABLE WITHIN 30 DAYS

TAX IDENTIFICATION # 04-3108175

**brownrudnick**

PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice 6914211  
Date Mar 5, 2021  
Client 035179

RE: THIRD PARTY CLAIMS

**INVOICE**

For professional services rendered in connection with the above captioned matter  
through January 31, 2021:

<b>Matter No.</b>	<b>Matter Name</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
035179.0017	THIRD PARTY CLAIMS	395.00	0.00	395.00
<b>Total</b>		<b>395.00</b>	<b>0.00</b>	<b>395.00</b>

Total Current Fees \$395.00

Total Current Costs \$0.00

**Total Invoice \$395.00**



PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
March 5, 2021  
Invoice 6914211  
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RE: THIRD PARTY CLAIMS

TIME DETAIL

Date	Professional	Description	Hours
01/05/21	RINNE	CORRESPOND WITH C. CASTALDI AND J. MENDEZ REGARDING TOLLING AGREEMENT	0.10
01/18/21	RINNE	ANALYZE STATUS OF NEXT TOLLING AGREEMENT DEADLINES AND CORRESPOND WITH M. SAWYER REGARDING SAME	0.10
01/19/21	RINNE	CORRESPOND WITH S. BEVILLE REGARDING NEXT TOLLING AGREEMENT DEADLINES	0.10
01/28/21	RINNE	ANALYZE NEXT TOLLING AGREEMENT DEADLINES (,1); CORRESPOND WITH S. BEVILLE AND C. CASTALDI REGARDING SAME (.1)	0.20
Total Hours			0.50

TIME SUMMARY

Professional	Hours	Rate	Value
BLAIR M. RINNE	0.50 hours at	790.00	395.00
Total Fees			395.00

INCLUDES ONLY TIME AND COSTS TO DATE  
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PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE  
C/O JAIME A. EL KOURY, ESQ.  
1112 PARK AVENUE, APT. 12A  
NEW YORK, NY 10128

Invoice	6914211
Date	Mar 5, 2021
Client	035179

RE: PUERTO RICO FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD, ACTING THROUGH ITS SPECIAL CLAIMS COMMITTEE

**Remittance** 

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**Balance Due: \$119,910.00**

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To ensure proper credit to your account, please include this page with your payment.

**Remittance Address**

Brown Rudnick LLP  
P.O. Box 52257  
Boston, MA 02205

**Wire Instructions**

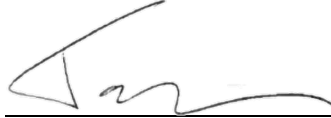
Citibank N.A.  
399 Park Avenue  
New York, NY 10022  
ABA Number: 021000089  
SWIFT Code: CITIUS33

**For Credit To**

Brown Rudnick LLP Deposit Account  
Account Number: 6792734594

**PRINCIPAL CERTIFICATION**

I hereby authorize the submission of this Twenty-Sixth Monthly Fee Statement for Brown Rudnick LLP covering the period from January 1, 2021 through January 31, 2021.



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Jaime A. El Koury  
General Counsel to the Financial Oversight  
and Management Board for Puerto Rico